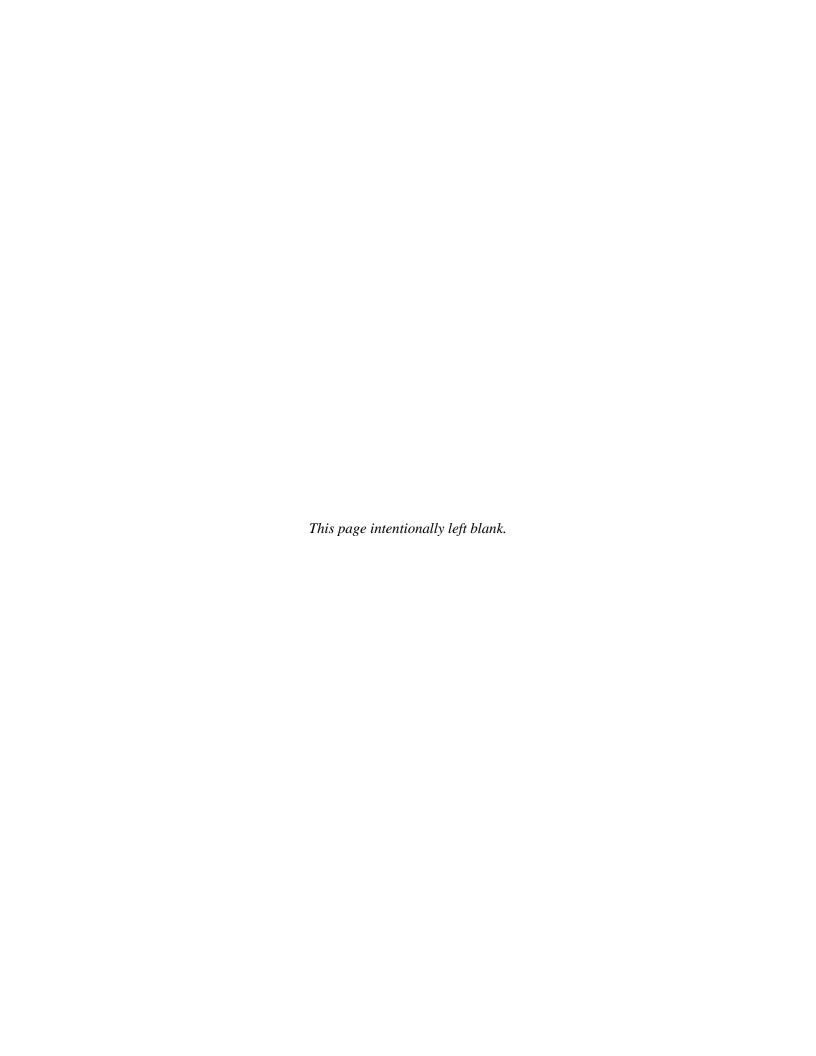
# NORTHERN ARIZONA PROPOSED WITHDRAWAL

## **ENVIRONMENTAL IMPACT STATEMENT**

#### **SCOPING REPORT**

Prepared by

U.S. Department of the Interior Bureau of Land Management Arizona Strip District



# **CONTENTS**

Acronyms and Abbreviations	v
1.0 INTRODUCTION	
1.1 Background	1
1.2 Purpose	
1.3 Location	3
1.4 Document Organization	3
2.0 SCOPING PROCESS	3
2.1 Advertising of Public Meetings	3
2.4 Public Scoping Meetings	4
2.5 Opportunities for Public Comment	
3.0 SCOPING CONTENT ANALYSIS	5
3.1 Development of the Coding Structure	
3.2 Database Analysis	
3.3 Identification and Coding of Comments	
3.4 Preparation of Scoping Report	
4.0 SUMMARY OF PUBLIC SCOPING COMMENTS	
4.1 Submittals Received	
4.2 Distribution of Submittals Received	
Geographic Origin	
Organizational Affiliation	
4.3 Theme Summary	
Air Quality	
Alternatives	
Aquatic Wildlife	23
Cumulative Impacts  Economic Conditions and Values	
Environmental Justice	
Anthropological Heritage and Cultural Resources	
Health and Safety	
Lands	
Laws, Policies	27
Minerals	27
Miscellaneous	28
Natural Environment	28
Noise	29

Natural Resources	29
Affected Persons and Groups	29
Recreation	30
Social Conditions and Values	30
Species of Concern	31
Soils and Geology	31
Transportation	31
Vegetation	31
Visual Resources	32
Water Resources	32
Wildlife	33
4.4 Comments Identified	33
4.5 Resource Advisory Council Comments	40
RAC Issue Summary	40
RAC Potential Alternative Criteria Summary	40
5.0 PRELIMINARY CONCERNS	41
Air Quality	42
Alternatives	42
Cultural Resources	42
Laws and Policies	43
Public Health and Safety	43
Recreation and Visuals	44
Socioeconomics	44
Soil and Water Resources	45
Special-Status Species	45
Transportation	45
Wildlife (General)	46
6.0 FUTURE STEPS IN THE EIS PROCESS	46

# **Appendices**

- A. Federal Register Notice of Intent
- B. Legal Advertisements
- C. Scoping Meeting Display Boards and Meeting Handouts, September 30, 2009, Fredonia, Arizona
- D. Scoping Meeting Display Boards and Meeting Handouts, October 15, 2009, Flagstaff, Arizona
- E. Form Letter Text

# **Figures**

1.	Proposed withdrawal (segregation) areas.	2
2.	Geographic distribution of submittals by county within Arizona	
3.	Distribution of submittals by county within Arizona.	
4.	Distribution of substantive issues in the comments received during public scoping	34
	Tables	
1.	Meeting Notification Methods and Dates	4
2.	Public Scoping Meeting Dates, Times, and Locations	4
3.	Resource Issue Identification	5
4.	Resource Code Identification	7
5.	Distribution of Submittals by Submittal Type	11
6.	Distribution of Non-duplicate Submittals by Commenter Type	12
7.	Geographic Distribution of Non-duplicate Submittals by Country	
8.	Distribution of Non-duplicate Submittals by State within the United States and Its Territories	
9.	Distribution of Submittals by County and City within Arizona	18
10.		
11.	General Distribution of Comments Identified in the Submittals Received during Public Scoping	33
12.	Distribution of Public Scoping Comments by Issue Category	34



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iv March 2010

#### **ACRONYMS AND ABBREVIATIONS**

BLM Bureau of Land Management

EIS environmental impact statement

FLPMA Federal Land Policy and Management Act

Forest Service U.S. Forest Service

NEPA National Environmental Policy Act

NPS National Park Service

Park Grand Canyon National Park

RAC Resource Advisory Council

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vi March 2010

#### 1.0 INTRODUCTION

# 1.1 Background

In March 2008, Congressman Raul Grijalva introduced H.R. 5583, the Grand Canyon Watersheds Protection Act, which called for the withdrawal of approximately 1 million acres from mining activity. In June 2008, a resolution from Congress stated that the Bureau of Land Management (BLM) and the U.S. Department of the Interior should impose an emergency withdrawal under the authority of Section 204(e) of the Federal Land Policy and Management Act of 1976 (FLPMA). Then-Secretary of Interior Dirk Kempthorne did not act on the resolution. Congressman Grijalva then reintroduced the Grand Canyon Watershed Protection Act in January 2009 (H.R. 644).

On July 21, 2009, the BLM published a Notice of Proposed Withdrawal and Opportunity for Public Meeting in the *Federal Register*. The Notice began a 2-year segregation of approximately 633,547 acres of BLM-managed public lands on the Arizona Strip District and 360,002 acres of National Forest System lands on the Kaibab National Forest (Figure 1) to allow for studies that would help determine whether a withdrawal for up to 20 years from mineral location and entry under the Mining Law of 1872 should or should not occur. Neither the segregation nor the proposed withdrawal would prohibit ongoing or future mining operations on valid pre-existing mining claims.

On August 26, 2009, the BLM published a Notice of Intent to prepare an environmental impact statement (EIS) on the proposed withdrawal in the *Federal Register*. The EIS is being prepared to analyze and disclose to the public the environmental, social, and economic impacts of the proposed withdrawal. The EIS will be prepared in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended; Council on Environmental Quality regulations implementing NEPA; FLPMA; and other associated laws and regulations. In addition to analyzing the potential impacts, the EIS will also identify and analyze alternatives to the Proposed Action. The EIS will analyze at least two alternatives, the "Proposed Action" to withdraw lands from the location of new mining claims and the "No-Action" alternative, which would continue to allow location of new mining claims. Other alternatives may be analyzed as appropriate, including withdrawal of a smaller area. The BLM is the lead agency preparing the EIS, in cooperation with the Forest Service and other federal, state, local, and tribal governments and government agencies.

## 1.2 Purpose

The purpose of the withdrawal, if determined to be appropriate, would be to protect the Grand Canyon watershed from adverse effects of locatable hardrock mineral exploration and mining (*Federal Register* 74[138]:35887). In terms of the watershed, there are concerns that uranium mining near Grand Canyon National Park (the Park) could result in the addition of radioactive materials and heavy metals to the surface water and groundwater that flows into the Park and the lower Colorado River. Dissolved uranium and other major, minor, and trace elements do occur naturally in groundwater as precipitation infiltrates from the surface through thousands of feet of rock formations to water-bearing zones, including the Redwall-Muav aquifer. However, there is concern that digging into the breccia pipes, which are cylindrical vertical rock formations in which uranium is found, could mobilize the uranium, causing it to be carried by water moving through the rock strata into the Redwall-Muav aquifer and other aquifers, from which it may eventually discharge into seeps and springs.

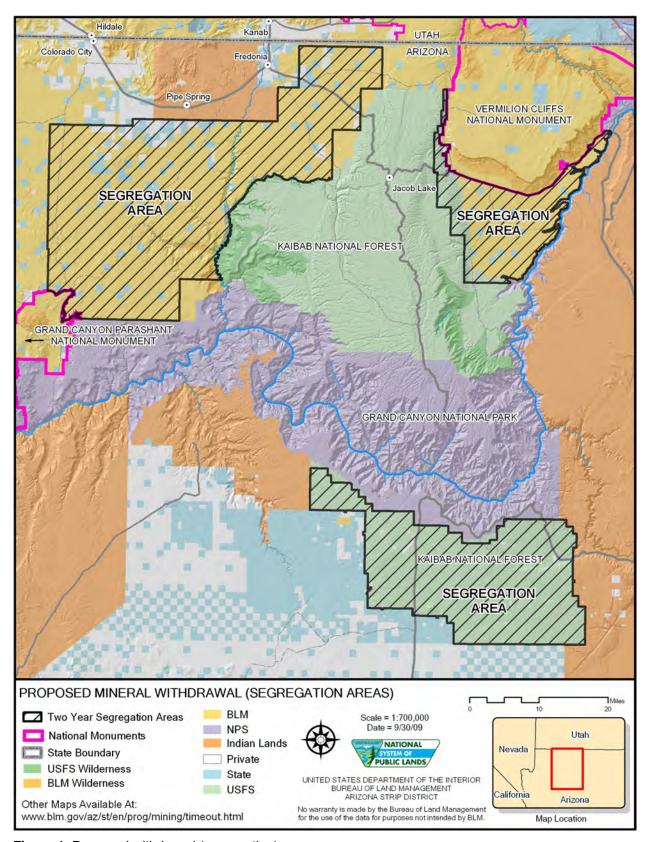


Figure 1. Proposed withdrawal (segregation) areas.



In support of the EIS process, the U.S. Geological Survey will undertake six studies to investigate the extent of uranium resources within the proposed withdrawal area, identify the potential effects of uranium mining on surface water and groundwater, and to identify the species and habitats vulnerable to uranium and associated elements, as well as the pathways for exposure.

#### 1.3 Location

The segregation order applies to all public-domain federal mineral interests within the approximately 1 million acres (not including Arizona State Land Department trust lands and private lands); the order means the public cannot enter these lands for the purpose of locating federal minerals or staking new mining claims. The approximately 8,300 mining claims already recorded with the BLM in the segregation areas remain in effect as long as the claimants continue to pay their annual maintenance fees, or until such time as the claims may be determined invalid. There are three parcels to the segregation area:

- Northwest of the Canyon Kanab Plateau (approximately 609,031 acres)
- Northeast of the Canyon House Rock (approximately 144,547 acres)
- South of the Canyon Tusayan (approximately 325,640 acres)

## 1.4 Document Organization

This document contains summary descriptions of

- scoping meetings, including public notices and advertising for the meetings;
- opportunities for public comment during the scoping period;
- the scoping content analysis process, including how individual letters and comments were coded and recorded; and
- comments received during the scoping period (August 26, 2009–October 30, 2009), organized by resource.

#### 2.0 SCOPING PROCESS

The purpose of scoping is to provide an opportunity for members of the public to learn about the proposed project and to share any concerns or comments they may have. Input from the public scoping process is used to help the BLM identify issues and concerns to be considered in the EIS, as well as identify potential alternatives. In addition, the scoping process helps identify any issues that are not considered relevant and can therefore be eliminated from detailed analysis in the EIS. The list of stakeholders and other interested parties is also updated and generally expanded during the scoping process.

As described in Section 1.1 of this report, the scoping process used for this EIS was initiated by publication of a Notice of Intent in the *Federal Register* on August 26, 2009. The period for submitting scoping comments was from August 26, 2009 through October 30, 2009, although scoping does not end until the EIS is completed.

## 2.1 Advertising of Public Meetings

Pursuant to NEPA requirements, the scoping meetings were advertised in a variety of formats, beginning at least 2 weeks prior to their scheduled dates (Table 1). In each format, the advertisements provided logistics and explained the purpose of the public meetings, gave the schedule for the public comment



(scoping) period, outlined additional ways to comment, and provided methods for obtaining additional information.

Table 1. Meeting Notification Methods and Dates

Publicity Item	Venue and Date	
Notice of Intent (Appendix A)	Federal Register – August 26, 2009	
Legal Advertisement (Appendix B)	Southern Utah News – August 26, 2009	
Mailing	Email to BLM Stakeholder List – September 10, 2009	
News Release (see Appendix B)	Southern Utah News – September 10, 2009 Arizona Daily Sun – September 10, 2009	
BLM Website	http://www.blm.gov/az – At least 15 days prior to the meetings	

## 2.4 Public Scoping Meetings

The BLM hosted two public meetings in September and October 2009, as shown in Table 2. The meetings were conducted in an open house format; this open house format was designed to allow attendees to view informational displays, ask specialists about the Proposed Action and the EIS process, and submit written or verbal comments on-site. Meeting attendees signed in upon entering, at which time they were provided with handouts and informed of the meeting format and how to comment at the meeting. The handouts and displays (Appendices C and D) provided information about the following:

- the NEPA process;
- Project background;
- Tentative project schedule;
- Preliminary issues to be analyzed in the EIS;
- Location maps; and
- How to provide comments.

Table 2. Public Scoping Meeting Dates, Times, and Locations

Date	Time	City	Address
September 30, 2009	6:00–8:00 p.m.	Fredonia	Fredonia Elementary School Cafeteria, 221 East Hortt Fredonia, Arizona
October 15, 2009	6:00–8:00 p.m.	Flagstaff	High Country Conference Center 201 West Butler Avenue Flagstaff, Arizona

## 2.5 Opportunities for Public Comment

Members of the public were afforded several methods for providing comments during the scoping period:

- Comments could be recorded on comment forms at the scoping meetings. Comment forms (see Appendix C) were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.
- Emailed comments could be sent to a dedicated email address: azasminerals@blm.gov.
- Individual letters and comment forms could be mailed via U.S. Postal Service to Bureau of Land Management, Mineral Withdrawal EIS, 345 East Riverside Drive, St. George, UT 84790.

All comments were given equal consideration, regardless of method of transmittal.



#### 3.0 SCOPING CONTENT ANALYSIS

There are four phases to the process used to analyze comments received during public scoping for the EIS: development of an issue coding structure, importing into and organizing all submittal content in a comment database, carefully reading each submittal and assigning codes to relevant comments, and preparation of a narrative report of the results of the analysis. It is important to note that the comment analysis process is not and should not be considered a vote. Every effort was made to qualify the intensity of the public's expressions, and all comments were treated evenly and were not weighted by number, organizational affiliation, "status" of the commenter, or other factors. Emphasis was on the content of a comment, rather than on who wrote it or the number of submitters who agreed with it.

# 3.1 Development of the Coding Structure

Initially, a coding structure was developed to help sort comments into logical categories and subcategories by issue, specifically resources and planning processes applicable to the project area. The issue coding structure was derived from an analysis of the range of issues covered in similar relevant planning documents and evolved as submittals were read and relevant comments identified. The use of these codes allows for quick access to comments on specific topics. Table 3 shows the issue categories that were determined to be most inclusive of the substantive comments received during public scoping.

Table 3. Resource Issue Identification

Resource Category	Resource Issue
AIR	Air Quality
ALT	Alternatives
AQW	Aquatic Wildlife
CUM	Cumulative Impacts
ECV	Economic Conditions and Values
EQJ	Environmental Justice
HCR	Anthropological Heritage and Cultural Resources
HSF	Health and Safety
LAN	Lands
LAW	Laws, Policies
MIN	Mineral Resources
MS	Miscellaneous
NAR	No Affected Resource
NAT	Natural Environment
NOI	Noise
NR	Natural Resources
PER	Persons or Groups
REC	Recreation
SCV	Social Condition/Values
SOC	Species of Concern
SOG	Soils and Geology
TRA	Transportation
VEG	Vegetation
VIS	Scenery, Visual Resources
WAT	Water Resources
WIL	Wildlife



## 3.2 Database Analysis

The second phase of the analysis process involved creating submittal records in a comments database for every submittal received. The majority of the submittals were delivered in electronic format (emails and letters in rtf and PDF formats), which expedited creating submittal records in the database using various import procedures. The commenter information and comment text for hard-copy submittals were entered into the database manually. Each submittal was recorded in the database, where it was assigned a unique number and was then labeled with a commenter type code that indicated the entity from which it was received (i.e., 'I' for individual; 'G' for government agency; 'O' for organization; 'B' for business; or 'T' for tribe). Submittals that included only a person's name and any address information were coded as having been received from an individual. If an affiliation with a business, government (federal, state, local), tribe, or organization was included in the commenter information of a submittal, the submittal record was assigned to the corresponding commenter type category. The combination of commenter type code and record number results in a unique alphanumeric identifier used for referencing and cross-checking submittals received and the comments identified within them.

The content of the submittals was then pre-screened in the database, using various queries and by reading through submittal text, to identify any potential form letters. As consistent content became obvious among submittals, a form letter record with that content was created in the database and assigned a number. Potential form letter submittals were then grouped and carefully re-read to identify any deviations from or additions to the original form letter content. If the content of the submittal matched the content of a form letter, the submittal record was assigned to that particular form letter. If a submittal included the original text of a form letter and had additional personal comments, the submittal was assigned to the corresponding form letter with a plus (+) sign (e.g., Form Letter 1+). If the content of a submittal was distinct from any identified form letters or deviated from the original content of the form letter enough to change the meaning or intended message of the form letter, the submittal was coded as either an 'Email' or 'Letter,' depending on its original mode of delivery.

Any submittals identified as having the same commenter information and content, regardless of delivery format (e.g., hard-copy letter, email) or date, were counted as one submittal; one record would get coded for its content according to the method described above; all other copies of the identical submittal were coded as 'Duplicate.'

## 3.3 Identification and Coding of Comments

Once submittal records were coded for commenter and submittal types, each submittal identified as an 'Email,' 'Fax,' 'Letter,' 'Public Comment Form,' or 'Form Letter [1–9]+' was read carefully to identify preliminary issues that will be addressed during the preparation of the EIS. Each individual statement identified as a relevant comment was assigned to a resource category (alphabetic abbreviations) corresponding to its respective resource issue (see Table 3). Additional resource codes (numeric) were added to all comments to identify specific comments within identified resource categories (Table 4). For example, a comment concerning the Colorado River watershed would first be coded as WAT (Water Resources) to identify this as a Water Resources issue, and then it would be coded as 07 (WAT 07) to document that the specific comment concerned watershed condition. Numbers were assigned in the order in which the specific comments were encountered during the comment analysis process. For each submittal received, there may have been several comments, each coded separately based on resource issue and then specific issue. This form of analysis allows for specific comments to be captured and then grouped under the umbrella of a general resource issue. It also allows for cross-referencing and comparison. All codes were assigned by one staff person and validated by another, and each discrete comment was entered, with its assigned code, into the comment database.



Table 4. Resource Code Identification

Resource Category	Resource Code	Description
AIR	01	General
	02	Dust
	03	Emissions
	04	Climate, Weather, and Atmospheric Processes
ALT	01	General
AQW	01	General
	02	Fisheries
CUM	01	General
	02	Past Mining
	03	Future Mining
	04	Nuclear Energy
ECV	01	General
	02	Demographics
	03	Population, Community Structure, and Stability
	04	Urbanization and Development
	05	Economic Role of Agency-Administered Lands/Resources
	06	International
	07	U.S.
	08	Tribal
	09	State/Regional/Local
	10	Employment/Jobs
	12	Tax Base and Payments to States, Counties, etc.
	13	Business Viability, Profits, Profit Motive
	14	Net Public Benefit and Agency Accounting
	15	Non-market Products/Services/Costs/Externalities
	16	Tax Dollars
	17	Tourism Economy
	18	Energy Needs
	19	Trade Deficit (Foreign Dependence)
EQJ	01	General
	02	Environmental Justice
HCR	01	General
	02	Archaeological Sites
	03	Traditional Cultural Properties
	04	Sacred Sites
HSF	01	General
	02	Radiation
	03	Public Health
	04	Mine Workers
	05	Hazardous Materials

 Table 4. Resource Code Identification (Continued)

Resource Category	Resource Code	Description
LAN	01	General
	02	National Forest System Lands
	03	Bureau of Land Management Lands
	04	National Park System Lands
	05	Wilderness
	08	General Access
	10	Private Property
	11	State Land
	12	Tribal Lands
	13	Other Federal Lands
LAW	01	General
	02	Federal, General/Multiple
	03	Constitution
	05	Individual Rights, Public Owns Federal Lands
	06	General Welfare, Public Good, Public Interest
	07	Federal Laws
	08	NEPA
	10	Indian Country Treaties
	11	Agency Rules, Plans, etc.
	12	Colorado River Watershed Protection Act
	13	Rules, Plans, etc., of Other Federal Agencies
	14	Laws, Rules, Plans, etc., of States
	15	County or Municipal Policies, Plans, etc.
	16	1872 Mining Law
	17	House Committee Withdrawal
MIN	01	General
	02	Uranium
	03	Valid Existing Rights
	04	Quantity of Claims
	05	Quality of Deposits
	06	Mining (General)
	07	Reclamation
MS	01	General Support of Withdrawal
	02	General Opposition of Withdrawal
	03	Public Controversy and Opposition of Mining Proposals
	04	Public Involvement
	05	Public Support of Mining
	06	Tribal Involvement
NAT	01	General
<del></del>	02	Environmental Quality and Ecosystem Integrity
	03	Inherent Worth of the Environment



 Table 4. Resource Code Identification (Continued)

Resource Category	Resource Code	Description
NOI	01	General
	02	Mining
NR	01	General
	02	Timber Resources
	03	Non-timber Vegetation Resources
	04	Range and Livestock
PER	01	Forest Service
	02	Bureau of Land Management
	03	National Park Service
	04	Other Agencies
	05	State, County, and Municipal Governments
	06	Tribal Members
	07	Environmental Groups
	08	Multiple Use/Wise Use Groups
	09	Recreation Groups
	10	Industry/Business Groups
	11	Local Citizens/Communities
	12	Nationwide Citizens/Communities
	13	Tourists
	14	Congress
	15	International Communities/Agencies
	16	Tribal Government
REC	01	General
	03	Value to Individuals, Families, Seniors, Disabled, etc.
	04	Motorized Recreation (General)
	07	Non-motorized, Non-mechanized Recreation
	08	Hiking, Backpacking
	10	Hunting and Fishing
	11	Camping, Dispersed
	13	Canoeing, Kayaking, Rafting, Swimming
SCV	01	General
	02	Quality of Life (Tradition, Traditional Way of Life)
	03	American Indian Values/Uses
	04	Spiritual Values, Solitude
	05	Land Value to Future Generations
	06	Tourism Values
	06 07	Tourism Values Cultural Values
SOC	07	
SOC		Cultural Values General
	07 01 03	Cultural Values  General  Threatened, Endangered, Proposed, Sensitive
SOC	07 01	Cultural Values General

Resource Resource Description Category Code TRA 01 General 02 Roads Network 03 Trucking 04 Mineral Transport VEG 01 General 02 Medicinal Plants 03 Noxious or Non-native Plants 04 Habitat/Vegetation Composition VIS 01 02 Mining Operations 04 Visibility WAT 01 General 02 Surface Water 03 Groundwater 04 Riparian Areas and Wetlands 05 Water Quantity 06 Water Quality 07 Watershed Condition 80 Regional Water Source (Drinking or Agriculture) 09 Contamination WIL 01 General 02 Genetic Diversity 03 Fragmentation, Perforation, and Connectivity 05 Terrestrial Game Species 06 Birds 07 Migratory Birds

Table 4. Resource Code Identification (Continued)

# 3.4 Preparation of Scoping Report

The final phase included identifying statements of public concern and preparing this narrative report. The statements of concern are a compilation of comments received from the public and various agencies during public scoping. The intent of this compilation is to provide representative statements that capture, with a minimum of repetition, all major concerns expressed during the public comment period. The statements are not necessarily verbatim iterations of comments received but in many cases include similar or exact phrasing.

### 4.0 SUMMARY OF PUBLIC SCOPING COMMENTS

#### 4.1 Submittals Received

A total of 83,525 submittals was collected during public scoping, 1,805 of which were identified as duplicate submittals. Of the 81,720 non-duplicate submittals received, 93.55% (76,452 submittals) were identified as form letters, 5.72% (4,671 submittals) as form letters with additional comments,



0.03% (28 submittals) as public comment forms, and the remainder as original content submitted via email (0.52%, or 428), letter (0.17%, or 139), or fax (<0.01%, or 2). Table 5 shows the total number of submittals received by submittal type. Appendix E provides a table showing the text from each of the 15 form letters identified in the submittals received.

Table 5. Distribution of Submittals by Submittal Type

Submittal Type	Submittals Received	% of Total
Email	428	0.51%
Fax	2	<0.01%
Form Letter 1	19,075	22.84%
Form Letter 1+	2,995	3.59%
Form Letter 2	20,570	24.63%
Form Letter 2+	304	0.36%
Form Letter 3	16	0.02%
Form Letter 3+	3	<0.01%
Form Letter 4	32,117	38.45%
Form Letter 4+	1,109	1.33%
Form Letter 5	2,091	2.50%
Form Letter 5+	98	0.12%
Form Letter 6	6	0.01%
Form Letter 6+	4	<0.01%
Form Letter 7	1,658	1.99%
Form Letter 7+	108	0.13%
Form Letter 8	567	0.68%
Form Letter 8+	31	0.04%
Form Letter 9	196	0.23%
Form Letter 9+	19	0.02%
Form Letter 10	30	0.04%
Form Letter 11	31	0.04%
Form Letter 12	6	0.01%
Form Letter 13	27	0.03%
Form Letter 14	32	0.04%
Form Letter 15	30	0.04%
Letter	139	0.17%
Public Comment Form	28	0.03%
Duplicate	1,805	2.16%
Total Submittals Received	83,525	100.00%

The majority of the non-duplicate submittals received were from individuals (99.92%, or 81,652 submittals). Organizations, businesses, governments, and tribal entities, combined, represented the remaining 0.08% (68 submittals). Table 6 shows the distribution of submittals by commenter type.

 Table 6. Distribution of Non-duplicate Submittals by Commenter Type

Commenter Type	Submittals Received	% of Total
Business	19	0.02%
Government	15	0.02%
Individual	81,652	99.92%
Organization	28	0.03%
Tribal	6	0.01%
Total non-duplicate submittals	81,720	100.00%

### 4.2 Distribution of Submittals Received

#### Geographic Origin

Geographic information was collected from commenter contact information provided in the comment submittals. Whenever incomplete or ambiguous information was encountered during analysis, reasonable attempts to determine geographic origin were made using public directories and the Internet. Of the 81,720 non-duplicate submittals received, the geographic origin of 194 submittals (0.24%) could not be conclusively determined.

It was determined that, of the remaining 81,526 submittals with verifiable geographic information, comments were received from 92 countries, including the United States. A total of 79,301 responses, or 97.04% of non-duplicate submittals, originated in the United States; it was not possible to conclusively determine the state(s) from which five of the U.S. submittals originated. Of the submittals received from within the United States, 3,475 (4.38% or 4.25% of all non-duplicate submittals) originated in Arizona. The cities for seven of the submittals received from Arizona are unknown. Table 7 shows the geographic distribution of comment submittals by country. Table 8 shows the distribution by state within the United States and its territories. Figures 2 and 3 show the distribution of comment submittals received by county within Arizona. Table 9 shows the distribution of submittals by county and city within Arizona.

Table 7. Geographic Distribution of Non-duplicate Submittals by Country

Country	Submittals Received	% of Total Received
Algeria	1	<0.01%
Argentina	21	0.03%
Australia	99	0.12%
Austria	24	0.03%
Azerbaijan	4	<0.01%
Bahamas	2	<0.01%
Bangladesh	2	<0.01%



**Table 7.** Geographic Distribution of Non-duplicate Submittals by Country (Continued)

Country	Submittals Received	% of Total Received
Barbados	1	<0.01%
Belgium	67	0.08%
Benin	1	<0.01%
Bermuda	1	<0.01%
Bolivia	1	<0.01%
Brazil	28	0.03%
Bulgaria	7	0.01%
Cameroon	2	<0.01%
Canada	390	0.48%
Cayman Islands	2	<0.01%
Chile	4	<0.01%
China	5	0.01%
Colombia	6	0.01%
Costa Rica	2	<0.01%
Croatia	11	0.01%
Cyprus	1	<0.01%
Czech Republic	2	<0.01%
Denmark	11	0.01%
Dominican Republic	1	<0.01%
Ecuador	2	<0.01%
Egypt	2	<0.01%
El Salvador	2	<0.01%
Estonia	3	<0.01%
Faroe Islands	1	<0.01%
Finland	25	0.03%
France	213	0.26%
Germany	135	0.17%
Gibraltar	1	<0.01%
Greece	43	0.05%
Guatemala	1	<0.01%
Honduras	1	<0.01%
Hong Kong	2	<0.01%
Hungary	5	0.01%
India	24	0.03%
Indonesia	1	<0.01%
Ireland	32	0.04%
Israel	9	0.01%

**Table 7.** Geographic Distribution of Non-duplicate Submittals by Country (Continued)

Country	Submittals Received	% of Total Received
Italy	177	0.22%
Jamaica	1	<0.01%
Japan	13	0.02%
Jordan	3	<0.01%
Korea, Republic of	2	<0.01%
Kuwait	1	<0.01%
Latvia	4	<0.01%
Libyan Arab Jamahiriya	1	<0.01%
Liechtenstein	1	<0.01%
Lithuania	1	<0.01%
Luxembourg	1	<0.01%
Macao	2	<0.01%
Macedonia, The Former Yugoslav Republic of	3	<0.01%
Malaysia	5	0.01%
Malta	2	<0.01%
Mexico	41	0.05%
Morocco	3	<0.01%
Netherlands	62	0.08%
New Zealand	19	0.02%
Nicaragua	6	0.01%
Norway	7	0.01%
Pakistan	2	<0.01%
Peru	5	0.01%
Philippines	13	0.02%
Poland	28	0.03%
Portugal	48	0.06%
Romania	20	0.02%
Russian Federation	14	0.02%
San Marino	1	<0.01%
Serbia	13	0.02%
Serbia and Montenegro	1	<0.01%
Singapore	12	0.01%
Slovakia	3	<0.01%
Slovenia	11	0.01%
South Africa	27	0.03%
South Georgia and South Sandwich Islands	1	<0.01%
Spain	91	0.11%
Sweden	26	0.03%



**Table 7.** Geographic Distribution of Non-duplicate Submittals by Country (Continued)

Country	Submittals Received	% of Total Received
Switzerland	30	0.04%
Taiwan, Province of China	3	<0.01%
Thailand	2	<0.01%
Turkey	6	0.01%
Ukraine	6	0.01%
United Kingdom	302	0.37%
United States	79,301	97.04%
Uruguay	1	<0.01%
Uzbekistan	1	<0.01%
Venezuela	5	<0.01%
Unknown	194	0.24%
Total Non-duplicate Submittals	81,720	100.00%

**Table 8.** Distribution of Non-duplicate Submittals by State within the United States and Its Territories

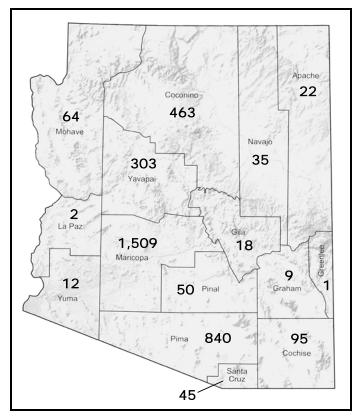
State or Territory	Submittals Received	% of Total Received from within the U.S.
Alabama	372	0.47%
Alaska	232	0.29%
Arizona	3,475	4.38%
Arkansas	349	0.44%
California	15,612	19.69%
Colorado	2,561	3.23%
Connecticut	1,113	1.40%
Delaware	196	0.25%
District of Columbia	160	0.20%
Florida	4,530	5.71%
Georgia	1,133	1.43%
Guam	7	0.01%
Hawaii	437	0.55%
Idaho	345	0.44%
Illinois	3,283	4.14%
Indiana	1,016	1.28%
lowa	530	0.67%
Kansas	457	0.58%
Kentucky	512	0.65%
Louisiana	353	0.45%
Maine	505	0.64%
Maryland	1,316	1.66%
Massachusetts	2,272	2.87%

**Table 8.** Distribution of Non-duplicate Submittals by State within the United States and Its Territories (Continued)

State or Territory	Submittals Received	% of Total Received from within the U.S.
Michigan	1,961	2.47%
Minnesota	1,388	1.75%
Mississippi	185	0.23%
Missouri	1,015	1.28%
Montana	333	0.42%
Nebraska	227	0.29%
Nevada	595	0.75%
New Hampshire	469	0.59%
New Jersey	2,317	2.92%
New Mexico	1,620	2.04%
New York	5,911	7.45%
North Carolina	1,814	2.29%
North Dakota	70	0.09%
Ohio	2,236	2.82%
Oklahoma	337	0.42%
Oregon	2,340	2.95%
Pennsylvania	2,939	3.71%
Puerto Rico	81	0.10%
Rhode Island	298	0.38%
South Carolina	475	0.60%
South Dakota	117	0.15%
Tennessee	897	1.13%
Texas	3,378	4.26%
Utah	587	0.74%
Vermont	348	0.44%
Virgin Islands	24	0.03%
Virginia	1,617	2.04%
Washington	3,172	4.00%
West Virginia	266	0.34%
Wisconsin	1,336	1.68%
Wyoming	157	0.20%
Armed Forces Abroad*	20	0.03%
Unknown	5	0.01%
Total Non-duplicate U.S. Submittals	79,301	100.00%

<sup>\*</sup> If a country name was provided in the commenter contact information, the submittal was coded to the country in which the commenter is stationed; otherwise, the submittal was coded as having been received from an address within the United States.





**Figure 2.** Geographic distribution of submittals by county within Arizona.

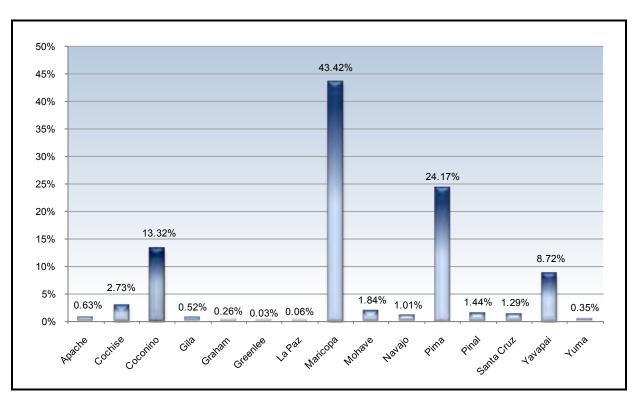


Figure 3. Distribution of submittals by county within Arizona.

**Table 9.** Distribution of Submittals by County and City within Arizona

County	City	Submittals Received
Apache	Chinle	3
	Concho	3
	Eagar	3
	Fort Defiance	3
	Sanders	1
	Springerville	3
	Tsaile	1
	Vernon	3
	Window Rock	2
	Subtotal	22
Cochise	Benson	7
	Bisbee	13
	Douglas	1
	Dragoon	1
	Fort Huachuca	1
	Hereford	11
	Palominas	2
	Pearce	9
	Portal	3
	Saint David	5
	Sierra Vista	41
	Tombstone	1
	Subtotal	95
Coconino	Bellemont	1
	Camp Verde	7
	Flagstaff	155
	Fredonia	126
	Gold Canyon	10
	Grand Canyon	1
	Happy Jack	1
	Marble Canyon	2
	Page	4
	Parks	1
	Sedona	112
	Supai	39
	Tuba City	2
	Williams	2
	Subtotal	463



**Table 9.** Distribution of Submittals by County and City within Arizona (Continued)

County	City	Submittals Received
Gila	Globe	3
	Huachuca City	5
	Payson	8
	Roosevelt	1
	Young	1
	Subtotal	18
Graham	Safford	7
	Thatcher	2
	Subtotal	9
Greenlee	Duncan	1
	Subtotal	1
La Paz	Parker	1
	Salome	1
	Subtotal	2
Maricopa	Anthem	3
	Apache Junction	22
	Avondale	12
	Buckeye	7
	Carefree	7
	Chandler	94
	El Mirage	3
	Fountain Hills	22
	Gilbert	70
	Glendale	65
	Goodyear	15
	Laveen	20
	Litchfield Park	2
	Mesa	135
	Morristown	1
	New River	4
	Paradise Valley	13
	Peoria	34
	Phoenix	538
	Queen Creek	13
	Scottsdale	204
	Sun City	27
	Sun City West	21
	Sun Lakes	4
	Tempe	43

**Table 9.** Distribution of Submittals by County and City within Arizona (Continued)

County	City	Submittals Received
Maricopa, continued	Tempe	107
	Tolleson	3
	Tonopah	1
	Waddell	1
	Wickenburg	1
	Wittmann	2
	Subtotal	1,509
Mohave	Bullhead City	9
	Chloride	3
	Dolan Springs	1
	Fort Mohave	3
	Golden Valley	7
	Humboldt	1
	Kingman	16
	Lake Havasu City	14
	Meadview	1
	Mohave Valley	1
	Peach Springs	8
	Subtotal	64
Navajo	Holbrook	1
•	Joseph City	3
	Kayenta	3
	Kykotsmovi	1
	Lakeside	7
	Pinetop	7
	Pinon	1
	Show Low	4
	Snowflake	3
	Taylor	1
	White Mountain Lake	1
	Winslow	3
	Subtotal	35
Pima	Ajo	5
· <del>-</del>	Amado	3
	Arivaca	2
	Coronado	1
	Cortaro	3
	Marana	5
	Oro Valley	1
	Saddlebrooke	2



**Table 9.** Distribution of Submittals by County and City within Arizona (Continued)

County	City	Submittals Received
Pima, continued	Sahuarita	10
	Sells	2
	Sonoita	6
	Tubac	2
	Tucson	782
	Subtotal	840
Pinal	Arizona City	1
	Casa Grande	14
	Coolidge	3
	Florence	1
	Maricopa	15
	Oracle	9
	Queen Valley	1
	Sacaton	5
	Superior	1
	Subtotal	50
Santa Cruz	Canelo	1
	Elgin	1
	Green Valley	28
	Nogales	2
	Patagonia	7
	Rio Rico	6
	Subtotal	45
Yavapai	Ash Fork	1
	Bagdad	1
	Black Canyon City	3
	Chino Valley	16
	Clarkdale	13
	Congress	5
	Cornville	17
	Cottonwood	36
	Dewey	7
	Groom Creek	1
	Jerome	6
	Mayer	2
	Paulden	3
	Prescott	135
	Prescott Valley	32
	Rimrock	7
	Skull Valley	4

**Table 9.** Distribution of Submittals by County and City within Arizona (Continued)

County	City	Submittals Received
Yavapai, continued	Vail	13
	West Sedona	1
	Subtotal	303
Yuma	Yuma	12
	Subtotal	12
Unknown		7
Total Received		3,475

#### Organizational Affiliation

Comments were received from unaffiliated individuals, government representatives, and various organizations, including environmental and recreational groups. Organization types were tracked for each letter, public comment form, form letter, fax, and email encountered over the course of the comment analysis. Unaffiliated individuals accounted for 99.92% (81,652 submittals) of the total non-duplicate responses, and 52 organizations were identified as having submitted comments. One email submittal received was sent on behalf of 34 organizations, some of which also submitted additional comments individually. Table 10 shows a list of organizations identified in the submittals received during public scoping.

Table 10. Organizations that Submitted Comments during Public Scoping

American Clean Energy Resources Trust	National Trust for Historic Preservation
Arizona Mining Association	Natural Resources Defense Council
Arizona Wildlife Federation	New Mexico Mining Association
ATICA, Inc.	New Mexico Wilderness Alliance
Center for Biological Diversity	New Mexico Wildlife Federation
Center for Native Ecosystems	Northwest Mining Association
Clean Water Action	Nuclear Energy Institute
Colorado Citizens Against Toxic Waste	Oregon Wild
Colorado Environmental Coalition	Pew Environment Group
Defenders of Wildlife	Progressive Democrats of Los Angeles
Earthjustice	Save Our South Park Water
Earthworks	Sheep Mountain Alliance
Ecology Center of Southern California	Sierra Club
Environment America	Sierra Club-Grand Canyon Chapter
Environment Colorado	Southern Utah Wilderness Alliance
Environmental Working Group	Tallahassee Area Community
Ethical Metalsmiths	The Coalition of National Park Service Retirees
Grand Canyon River Guides, Inc.	The Western Organization of Resource Councils
Grand Canyon Trust	The Wilderness Society
Groundwater Awareness League	Uranium Producers of America



Table 10. Organizations that Submitted Comments during Public Scoping (Continued)

High Country Citizens' Alliance	Uranium Watch
Inform Colorado	Washington Wilderness Coalition
Kaibab County Committee	Western Business Roundtable
League of Conservation Voters	Western Colorado Congress
National Mining Association	Western Nebraska Resources Council
National Parks Conservation Association	Wild at Heart

# 4.3 Theme Summary

Individual comments were assigned to one of 26 resource categories (see Table 4) on the basis of the overall theme of the comment. Below is a summary of these themes. Not all comments coded were considered substantive.

#### Air Quality

Comments coded AQ-01 address concerns about the impacts uranium mining has to the general air quality in the area surrounding the Park as well as potential impacts to human health from uranium ore dust in the air.

Comments coded AQ-02 address concerns about the dust that may be generated from uranium mining activities and the use of unpaved roads for access; this includes concerns about visibility in the Park as a result of fugitive dust. This includes comments requesting that dust mitigation be used on all dirt roads during times of ore truck traffic.

Comments coded AQ-03 address concerns about the emissions associated with potential mining operations and associated traffic if uranium exploration and mining continues in the area surrounding the Park. This includes comments that pre-existing emissions from coal plants, cities, traffic, and other sources of regional air quality pollution should be considered in the cumulative effects.

Comments coded AQ-04 address concerns about greenhouse gas emissions from potential mining operations and associated traffic, as well as the potential for future mining operations to contribute to global warming and suggestions to use wind and solar energy instead of nuclear energy. This also includes comments that developing uranium would result in greater development of clean energy and would reduce carbon emissions.

#### **Alternatives**

Comments that address any alternative to the Proposed Action were coded ALT-01. This included suggestions for limited withdrawal alternatives, which could include keeping mining areas as close as possible to the communities that support mine development or limiting the withdrawal area based on factors such as protection of sensitive resources.

## Aquatic Wildlife

Comments coded AQW-01 address concerns about the impacts uranium exploration and mining may have to fish habitat in the area surrounding the Park. This includes concerns about water quality of surface water in the region and the implications for fish species within those waters.

#### **Cumulative Impacts**

Comments that address the past, present, and future projects in the area and their cumulative implications for such resources as water, sensitive species, soils, air quality, vegetation, wildlife, human health, and cultural resources were coded CUM-01.

Comments that address the past mining in the area, both beneficial and adverse, were coded CUM-02. This includes comments about the good track record of uranium mining in the region and comments about the history of degradation associated with past uranium mining.

Comments that address the concern of future mining in the area, including requests for no new mining and comments that support the future of mining, were coded CUM-03.

Comments that address nuclear energy were coded CUM-04. This includes comments that address the need for uranium to run nuclear power plants, nuclear energy's role in the nation's energy future, and comments about adverse impacts that may result from using nuclear energy in the future.

#### **Economic Conditions and Values**

Comments coded as ECV-01 address general economic concerns that could result from the proposed withdrawal.

Comments coded as ECV-02 address the population in the area surrounding the Park, including how the population in the area is small and shrinking.

Comments coded as ECV-04 address concerns that mining companies have been allowed to exploit public lands without giving the American people a fair return for use of these lands.

Comments coded ECV-05 address the economic significance of the uranium deposits in the area surrounding the Park and the beneficial and adverse economic impacts developing public lands could have in the area.

Comments coded ECV-06 address the world's consumption of uranium and how developing the uranium deposits in the area surrounding the Park could have worldwide implications.

Comments coded ECV-07 address how the development of the uranium deposits in the area surrounding the Park could impact the economy of the entire United States. This includes comments about the need for uranium in order for the United States to have a strong national economy and economic security.

Comments coded ECV-08 address the potential for improved economic status of Native Americans as a result of employment with uranium mining operations.

Comments coded ECV-09 address the potential impacts, both beneficial and adverse, of the proposed withdrawal to the regional economy and the local economy.

Comments coded ECV-10 address potential impacts to employment in the area. These include comments about direct and indirect (so-called "multiplier effect") employment opportunities that would result from future uranium exploration and mining.

Comments coded ECV-12 address the revenue generated by uranium mining. This includes comments that address the benefit of federal, state, and local taxes paid by mining companies.



Comments coded ECV-13 concerns that blocking vested property rights that claim holders have could constitute a "taking" and that the federal government would need to pay claim holders just compensation for this "taking." Also included are comments that address the greed of mining corporations.

Comments coded ECV-14 address the net public benefit of allowing further uranium exploration and mining in the area surrounding the Park, including concerns that the risk of contamination from uranium is not worth the short-term profits a few uranium mining companies might make.

Comments coded ECV-16 address the tax dollars that future uranium exploration and mining may generate and cost Americans taxpayers. This includes comments about the taxes uranium mining could generate on the state, federal, and local levels, along with comments about the potential cost of mine cleanup for the American tax payers.

Comments coded ECV-17 address the impacts the project may have to local tourism economy. This includes comments regarding the regional tourist economy connected to the Park, Havasupai Springs, and other tourist draws in the area in terms of jobs, annual revenues, and tax revenues across different tourism sectors.

Comments coded ECV-18 address the need to use northern Arizona's rich uranium deposits to meet America's pressing demand for clean, domestic, non-carbon-emitting energy, along with the increasing demand for energy as the population grows. This includes concerns that the proposed withdrawal would jeopardize America's future energy security and the expansion of nuclear power to meet the nation's clean energy needs.

Comments coded ECV-19 address the need to use uranium deposits in the area surrounding the Park to reduce dependence on foreign energy sources. This includes concerns that the proposed withdrawal may displace jobs and associated revenue and taxes to foreign countries.

#### **Environmental Justice**

Comments coded EQJ-01 address concerns that Native people in the region have been and continue to be considered inferior.

Comments coded EQJ-02 address the theme of disproportionate impacts to low-income and minority populations in the area, including many Native American tribes.

#### Anthropological Heritage and Cultural Resources

Comments that address the potential impacts of uranium exploration and mining to cultural resources were coded HCR-01.

Comments that address the disturbance or removal of significant prehistoric or historic period sites were coded HCR-02. This included comments addressing potential mitigation measures to be considered with respect to the disturbance to archaeological sites.

Comments that address concerns that Traditional Cultural Properties could potentially be adversely impacted by uranium exploration and mining, including Red Butte and the Park, were coded HCR-03.

Comments that address concerns about adverse impacts uranium exploration and mining may have to sites and resources held sacred to Native Americans were coded HCR-04. This includes the importance of springs and seeps as sacred and religious sites.

#### Health and Safety

Comments coded HSF-01 generally address concerns about the impacts that further uranium exploration and mining could have to the health and safety of the surrounding residents and visitors.

Comments coded HSF-02 address the risks associated with exposure to radiation and the implications of radiation exposure for the environment and human health.

Comments coded HSF-03 address concerns about the health of surrounding residents, mine workers, and visitors to the general area of future uranium mines. This includes concerns about airborne disease, traffic safety, and potential long-term health impacts associated with mine operations.

Comments coded HSF-04 address concerns about the safety of the employees conducting the uranium exploration and mining. This includes long-term health problems for employees that uranium mining has caused in the past, along with concerns about workplace safety.

Comments coded HSF-05 address how and where hazardous and toxic waste resulting from uranium mining would be disposed of, impacts of dumping toxins into the ground, potential health and safety issues resulting from direct or indirect contact with hazardous waste, and potential long-term impacts that contamination may have to the area.

#### Lands

General comments about protecting public lands were coded LAN-01.

Comments about multiple use of U.S. Forest Service (Forest Service) land and the potential impacts of uranium exploration and mining to the Kaibab National Forest south of the Park were coded LAN-02.

Comments about multiple use of BLM land and the potential impacts of uranium exploration and mining to the BLM land north of the Park were coded LAN-03.

Comments about potential impacts of uranium exploration and mining to National Park Service (NPS) land, including the Park, were coded LAN-04.

Comments about wilderness areas in Northern Arizona, including comments about the potential impacts to these areas from future uranium exploration and mining and comments that address the Arizona Wilderness Act of 1984, which already protects wilderness areas from uranium mining activities, were coded LAN-05.

Comments that address the potential impacts of uranium exploration and mining to Arizona State Land Department trust lands were coded LAN-11.

Comments that address the potential impacts of uranium exploration and mining to Tribal Reservations in northern Arizona were coded LAN-12.

Comments that address the potential impacts of uranium exploration and mining to federal lands excluding BLM, Forest Service land, and NPS land were coded LAN-13. This includes memorials and monuments such as Glen Canyon Recreation Area, Vermilion Cliffs National Monument, and Grand Staircase—Escalante National Monument.



#### Laws, Policies

Comments coded LAW-01 address general concerns about laws, including concerns that current laws provide the area of the withdrawal with protection and concerns that a change in the laws is necessary to provide protection.

Comments coded LAW-02 address federal laws currently in place that govern mining activities, including but not limited to Clean Air Act, Clean Water Act, NEPA, FLPMA, and Endangered Species Act.

Comments coded LAW-07 address the existing applicable federal laws with which mining operations must comply.

Comments coded LAW-08 address the requirements the EIS process must meet under NEPA. NEPA requires the EIS to fully disclose and analyze potential short-term, long-term, and cumulative environmental impacts of the project.

Comments coded LAW-10 address tribal treaties with which mining operations must comply.

Comments coded LAW-11 address BLM and Forest Service plans with which mining operations must comply, including BLM and Forest Service management plans. This includes comments that suggest BLM's current regulations provide enough protection for the resources in the area to negate the need for the proposed withdrawal.

Comments coded LAW-12 address the proposed Watershed Protection Act, which would permanently withdraw lands around the Grand Canyon for mineral entry.

Comments coded LAW-13 address plans and rules of federal agencies, excluding the BLM and Forest Service.

Comments coded LAW-14 address applicable Arizona state laws with which mining operations must comply, including the Arizona Wilderness Protection Act of 1984.

Comments coded LAW-15 address state and county laws with which mining operations must comply. This includes a resolution that the Coconino County Board of Supervisors passed opposing uranium development in the vicinity of the Grand Canyon.

Comments coded LAW-16 address concerns about the 1872 Mining Law. This includes comments that this law is outdated and needs to be revised to provide adequate protection.

Comments coded LAW-17 address Representative Grijalva's proposed withdrawal in northern Arizona.

#### Minerals

Comments that address general mineral concerns were coded MIN-01. This includes concerns about the implications the withdrawal would have to metal and mineral industries and requests to protect the land from mineral entry.

Comments that address the need for uranium, the dangers and toxicity of uranium, and general comments about uranium deposits in the area were coded MIN-02. This includes comments about where the mined uranium would be sold, stored, and processed.

Comments that address valid existing rights for uranium claims were coded MIN-03. This includes comments requesting that no exploration of existing claims happen without first determining valid existing rights.

Comments that address the need for the proposed withdrawal to protect the area from the alarming number of mining claims being staked in the area surrounding the Park were coded MIN-04.

Comments that address the high grade and potential of the uranium deposits in northern Arizona were coded MIN-05. This includes comments that estimate the value of the uranium deposits and concerns about the potential loss of revenue if these deposits are not developed.

Comments that address general comments about mining were coded MIN-06. This includes comments specifically about breccia pipe mining and the small amount of disturbance associated with this mining.

Comments that address reclamation of uranium exploration and mining once operations have ceased were coded MIN-07. This includes comments that address the success of past reclamation efforts, difficulty of successfully reclaiming the site, and potential long-term safety hazards in the area.

#### Miscellaneous

Comments coded MS-01 are in support of the withdrawal and against future uranium mining in the area surrounding the Park.

Comments coded MS-02 are in opposition of the withdrawal and support leaving the withdrawal area open to future uranium exploration and mining.

Comments coded MS-03 request that the EIS plainly and fully disclose the widespread opposition and public controversy surrounding this uranium exploration proposal from the public, tribes, county, state, downstream communities, NPS, and Congress.

Comments coded MS-04 request that the BLM ensure that the public is involved throughout the EIS process.

Comments coded MS-05 address the public support of mining in the area, including the Arizona State Legislature, National Association of Counties, Mohave County, Arizona and Kane County, Utah.

Comments coded MS-06 request that the BLM involves the impacted tribes in the EIS process.

#### Natural Environment

Comments that address general concerns about potential impacts that uranium exploration and mining may have to the environment and planet were coded NAT-01.

Comments that address concerns about potential damage to regional ecosystems from uranium exploration and mining and the need to protect these ecosystems were coded NAT-02.

Comments that address concerns that the area is more precious than the profits resulting from uranium mining were coded NAT-03.

Comments that address the importance of the Grand Canyon ecosystem were coded NAT-04. This includes comments that the Grand Canyon is a national and international treasure, comments that address how fragile the Grand Canyon ecosystem is, and comments calling for protection of this ecosystem.



## Noise

Comments that address general impacts to the surrounding soundscape, including the Park, were coded NOI-01.

Comments that address impacts machine noise from the drill rigs, compressor, and other equipment associated with uranium mining would have to the noise levels in the area were coded NOI-02.

## Natural Resources

Comments coded NR-01 address protection and development of natural resources.

# Affected Persons and Groups

Comments coded PER-01 address impacts of the withdrawal to the Forest Service, including impacts to its missions.

Comments coded PER-02 address impacts of the withdrawal to the BLM, including concerns that the BLM is not managing the land in a healthy way.

Comments coded PER-03 address impacts of the withdrawal to the NPS. This includes requests that the NPS have the last word on impacts to the Park and impacts to NPS missions.

Comments coded PER-04 address impacts of the withdrawal to other agencies, for example the U.S. Environmental Protection Agency.

Comments coded PER-05 address impacts of the withdrawal to state, county, and municipal governments. This includes comments addressing the opposition represented by these entities.

Comments coded PER-06 address impacts of the withdrawal to tribal members. This includes impacts to local tribes' traditional practices and sacred lands, as well as cumulative effects of past uranium mining on the regional tribal members.

Comments coded PER-07 address impacts of the withdrawal to environmental groups, including the Sierra Club, Grand Canyon Trust, Center for Biological Diversity, and others.

Comments coded PER-09 address impacts of the withdrawal to recreation groups in the area, including hikers, rafters, etc.

Comments coded PER-10 address impacts to businesses and industry groups. This includes adverse impacts the withdrawal would have to the mining industry and mining companies.

Comments coded PER-11 address impacts of the withdrawal, both beneficial and adverse, to local citizens and communities.

Comments coded PER-12 address how the withdrawal would impact citizens nationwide.

Comments coded PER-13 address impacts of the withdrawal to tourists who would come to the area surrounding the Park. This includes comments about visitor experience in the area and individuals' experiences visiting the area.

Comments coded PER-14 address impacts of the withdrawal as it relates to Congress, including the opposition to uranium mining that members of Congress have expressed.

Comments coded PER-15 address impacts of the withdrawal to international communities and agencies, including international tourists who would visit the area surrounding the Grand Canyon; the comments also address international interest in this project because of the global need for uranium.

Comments coded PER-16 address impacts of the withdrawal to tribal governments. This includes opposition expressed by tribal governments and requests that tribal governments be involved in the EIS process.

## Recreation

Comments that address the potential displacement of recreationists that frequent the area, loss of access to recreational land, loss of recreational opportunities in the area, and decreased recreational value of the area were coded REC-01.

Comments that address the value of the area surrounding the Park for recreational activities were coded REC-03. This includes comments about individuals' experiences recreating in the area.

Comments that address concerns about the area being used for illegal motorized recreation were coded REC-04.

Comments that address backcountry and non-motorized recreational opportunities in the area were coded REC-07. This includes concerns that backcountry drinking water sources could be impacted, thus affecting backcountry recreational users.

Comments that address hiking and backpacking opportunities in the area surrounding the Park were coded REC-08. This includes personal accounts of individuals' experiences hiking and backpacking in the area.

Comments that address the hunting opportunities available in the area surrounding the Park, including the population of mule deer, elk, pronghorn, and turkey, were coded REC-10.

Comments that address the camping opportunities in the area surrounding the Park, including individuals' experiences camping in the area, were coded REC-11.

Comments that address the rafting, canoeing, kayaking, and swimming opportunities in the area, specifically in the Colorado River, were coded REC-13. This includes individuals' experiences using the area for water recreation.

## Social Conditions and Values

Comments coded SCV-01 address general social conditions and value concerns associated with the proposed withdrawal.

Comments coded SCV-02 address potential change in overall quality of life if further uranium exploration and mining takes place in the area surrounding the Park. These include concerns about the well-being and welfare of residents and visitors.

Comments coded SCV-03 address potential impacts to Native Americans' ways of life, traditional beliefs, and cultural practices.

Comments coded SCV-04 address impacts to the spiritual places in the area surrounding the Park and the value of the Grand Canyon to individuals.



Comments coded SCV-05 address the importance to protect the natural resources, wildlife, and land surrounding the Park for future generations.

Comments coded SCV-06 address the impacts further uranium exploration and mining may have to visitor experiences in the area surrounding the Park.

Comments coded SCV-07 address the cultural value of the area surrounding the Park. This includes comments about the national heritage found in the area and the cultural and historical significance of the area.

# Species of Concern

Comments that address the potential for uranium exploration and mining to result in loss of suitable habitat for special-status species, fragmentation of habitat for special-status species, and displacement of special-status species were coded SOC-01.

Comments that address the potential impacts of uranium exploration and mining to threatened and endangered species were coded SOC-03. This includes comments specifically addressing California condors, black-footed ferrets, and Gunnison's prairie dogs.

# Soils and Geology

Comments coded SOG-01 generally address the geological impacts associated with uranium exploration and mining. This includes comments about breccia pipe geology.

Comments coded SOG-02 address the loss of topsoil and potential soil contamination from uranium exploration and mining activities.

Comments that address the potential impact to paleontological resources in the area were coded SOG-04. This includes comments concerned with Ice Age animals and other fossils found in the area surrounding the Park.

# **Transportation**

Comments coded TRA-01 address concerns about increased heavy vehicle traffic to and from the uranium exploration and/or mining sites.

Comments coded TRA-02 address concerns about road development resulting from any development of uranium mines in the area.

Comments coded TRA-03 address concerns about additional truck traffic from potential uranium mines and its implications for the road systems, environment, residents, visitors, and wildlife. This includes concerns that increased mine traffic may contribute to conflicts between tourism and mining-associated development and traffic. Also this includes comments that request the EIS to analyze the total number of ore truck trips that would be required for mining activities.

Comments coded TRA-04 address concerns about ore transportation from potential mining sites.

# Vegetation

Comments coded VEG-01 address the general loss of vegetation from uranium exploration and mining activities.



Comments coded VEG-03 address the potential increase in noxious and invasive plants through vehicles and equipment associated with uranium exploration and mining.

Comments coded VEG-04 address the potential loss of wildlife habitat from uranium exploration and mining activities.

## Visual Resources

Comments coded VIS-01 address scenic resources and natural beauty of the area, including the Park, which is known for its beauty.

Comments coded VIS-02 address concerns that uranium mining may impact the scenic resources in the area.

Comments coded VIS-04 address concerns that pollution and dust generated from potential uranium exploration and mining may impact visibility in the area, including in the Park.

## Water Resources

Comments coded WAT-01 address the general impacts to water resources in the area as a result of potential uranium exploration and mining.

Comments coded WAT-02 address concerns that uranium exploration and mining may result in the contamination and/or depletion of surface water, including the Colorado River, streams, springs, and seeps in the area.

Comments coded WAT-03 address concerns about the impacts uranium exploration and mining may have to groundwater and aquifers in the region. This includes contamination and depletion of these water sources and the implications for connections to surface waters.

Comments coded WAT-04 address concerns that uranium exploration and mining may impact riparian habitats in the area, which are an important part of the ecosystem and support many wildlife species.

Comments coded WAT-05 address concerns about how potential uranium exploration and mining may impact water quantity in the area if water is used in construction- or operations-related activities.

Comments coded WAT-06 address concerns about how potential uranium exploration and mining may impact water quality in the area.

Comments coded WAT-07 address concerns that uranium exploration and mining may adversely impact the watershed surrounding the Park, including contamination from uranium and heavy metals.

Comments coded WAT-08 address concerns that uranium exploration and mining may result in contamination and/or depletion of the Colorado River, which supplies millions of people with water throughout the Southwest. This includes the effects in the Southwest if the Colorado River were to be contaminated and the cumulative impact of over-allocating the Colorado River.

Comments coded WAT-09 address concerns that uranium exploration and mining may contaminate the water in the Colorado River and surrounding area. This includes potential contamination from uranium, heavy metals, fuels, lubricants, solvents, and other toxic chemicals and related impacts resulting from the contamination to livestock, wildlife, and residents in the area.



## Wildlife

Comments coded WIL-01 address general concerns about impacts to wildlife species, including impacts to wildlife from transportation, noise, visual, mining operations, and/or groundwater depletion and contamination, if uranium exploration and mining are to continue in the area. This also includes comments that request the EIS to disclose species associated with these areas and to describe their tolerances, if know, to all contaminants that could result from uranium mining.

Comments that address the impacts uranium exploration and mining may have to the diversity of wildlife species in the area surrounding the Park were coded WIL-02.

Comments that address the fragmentation of habitat that may result from further uranium exploration and mining were coded WIL-03.

Comments that address the impact uranium exploration and mining may have to mule deer, pronghorn, and turkey hunting opportunities were coded WIL-05.

Comments that address concerns that uranium exploration and mining may impact bird species in the area surrounding the Park, including many endangered and threatened species, were coded WIL-06.

Comments that address potential impacts to migratory birds from further uranium exploration and mining were coded WIL-07.

## 4.4 Comments Identified

A total of 11,040 substantive comments were identified in the non-duplicate submittals received during public scoping. Once all were assigned a resource category and code, they were filtered for duplicates: any comments having the same content, resource category, and resource code were counted as one comment, regardless of source. Most of the submittals did not offer substantive comments in that they did not identify specific issues, suggest alternatives, or recommend studies, persons, or agencies to be consulted. A total of 8,695 individual comments were identified in the submittals received. Table 11 shows the general distribution of comments identified by submittal groups. Figure 4 shows the distribution, by percentage, of the most frequently mentioned substantive issues by resource category. Table 12 shows the distribution of individual comments received by resource category and resource code.

**Table 11.** General Distribution of Comments Identified in the Submittals Received during Public Scoping

Comment Source	Comments Identified	% of All Comments	Submittals Received*
Unique submittals (email, fax, or letter)	6,570	59.51%	569
Individual comments added to form letters	3,963	35.90%	4,671
Public comment forms	232	2.10%	28
Original content of form letters	275	2.49%	76,452
Total comments identified in all non-duplicate submittals	11,040	100.00%	81,720
Duplicate comments <sup>†</sup>	2,345		
Total Individual Substantive Comments Identified	8,695		

<sup>\*</sup> Non-duplicate submittals.

<sup>&</sup>lt;sup>†</sup> There were several instances in which a submittal included text that was also found in another submittal (e.g., a unique letter that included an excerpt from one of the identified form letters). Any substantive comments identified in the duplicated text were recorded and coded for each submittal, but only one instance of the comment was counted for determining the total number of individual comments identified.



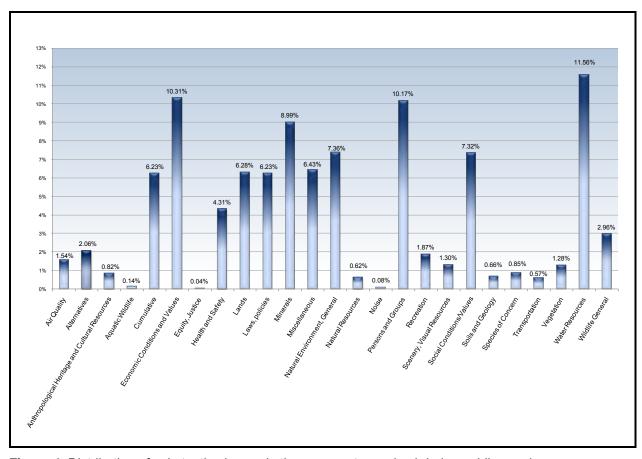


Figure 4. Distribution of substantive issues in the comments received during public scoping.

Table 12. Distribution of Public Scoping Comments by Issue Category

Code	Description	Comments
AIR	Air Quality	
01	General	72
02	Dust	14
03	Emissions	17
04	Climate, Weather, and Atmospheric Processes	29
	Subtotal	132
ALT	Alternatives	
01	General	174
	Subtotal	174
AQW	Aquatic Wildlife	
01	General	10
02	Fisheries	2
	Subtotal	12



Table 12. Distribution of Public Scoping Comments by Issue Category (Continued)

Code	Description	Comments
CUM	Cumulative Impacts	
01	General	121
02	Past Mining	245
03	Future Mining	81
04	Nuclear Energy	103
	Subtotal	550
ECV	Economic Conditions and Values	
01	General	121
02	Demographics	3
03	Population, Community Structure, and Stability	1
04	Urbanization and Development	1
05	Economic Role of Agency-Administered Lands/Resources	29
06	International	7
07	U.S.	13
80	Tribal	1
09	State/Regional/Local	50
10	Employment/Jobs	64
12	Tax Base and Payments to States, Counties, etc.	32
13	Business Viability, Profits, Profit Motive	241
14	Net Public Benefit and Agency Accounting	28
15	Non-market Products/Services/Costs/Externalities	3
16	Tax Dollars	35
17	Tourism Economy	80
18	Energy Needs	123
19	Trade Deficit (Foreign Dependence)	67
	Subtotal	899
EQJ	Environmental Justice	
01	General	1
02	Environmental Justice	2
	Subtotal	3
HCR	Anthropological Heritage and Cultural Resources	
01	General	47
02	Archaeological Sites	8
03	Traditional Cultural Properties	7
04	Sacred Sites	9
	Subtotal	71

 Table 12. Distribution of Public Scoping Comments by Issue Category (Continued)

Code	Description	Comments
HSF	Health and Safety	
01	General	109
02	Radiation	27
03	Public Health	117
04	Mine Workers	21
05	Hazardous Materials	99
	Subtotal	373
LAN	Lands	
01	General	156
02	National Forest System Lands	47
03	Bureau of Land Management Lands	40
04	National Park System Lands	143
05	Wilderness	79
80	General Access	1
10	Private Property	19
11	State Land	23
12	Tribal Lands	22
13	Other Federal Lands	9
	Subtotal	539
LAW	Laws, Policies	
01	General	116
02	Federal, General/Multiple	11
03	Constitution	2
05	Individual Rights, Public Owns Federal Lands	1
06	General Welfare, Public Good, Public Interest	2
07	Federal Laws	49
80	NEPA	78
10	Indian Country Treaties	2
11	Agency Rules, Plans, etc.	18
12	Colorado River Watershed Protection Act	25
13	Rules, Plans, etc., of Other Federal Agencies	4
14	Laws, Rules, Plans, etc., of States	28
15	County or Municipal Policies, Plans, etc.	8
16	1872 Mining Law	182
17	House Committee Withdrawal	27
	Subtotal	553



Table 12. Distribution of Public Scoping Comments by Issue Category (Continued)

Code	Description	Comments
MIN	Minerals	
01	General	125
02	Uranium	252
03	Valid Existing Rights	18
04	Quantity of Claims	77
05	Quality of Deposits	42
06	Mining (General)	163
07	Reclamation	119
	Subtotal	796
MS	Miscellaneous	
01	General Support of Withdrawal	444
02	General Opposition of Withdrawal	76
03	Public Controversy and Opposition of Mining Proposals	29
04	Public Involvement	13
05	Public Support of Mining	5
06	Tribal Involvement	5
	Subtotal	572
NAT	Natural Environment	
01	General	159
02	Environmental Quality and Ecosystem Integrity	60
03	Inherent Worth of the Environment	84
04	Grand Canyon Ecosystem	333
	Subtotal	636
NOI	Noise	
01	General	6
02	Mining	1
	Subtotal	7
NR	Natural Resources	
01	General	47
02	Timber Resources	1
03	Non-timber Vegetation Resources	1
04	Range and Livestock	3
	Subtotal	52
PER	Affected Persons and Groups	
01	Forest Service	5
02	Bureau of Land Management	14
03	National Park Service	26
04	Other Agencies	8
05	State, County, and Municipal Governments	26
06	Tribal Members	90

 Table 12. Distribution of Public Scoping Comments by Issue Category (Continued)

Code	Description	Comments
PER	Affected Persons and Groups	
07	Environmental Groups	14
08	Multiple Use/Wise Use Groups	2
09	Recreation Groups	27
10	Industry/Business Groups	99
11	Local Citizens/Communities	55
12	Nationwide Citizens/Communities	22
13	Tourists	448
14	Congress	27
15	International Communities/Agencies	2
16	Tribal Government	7
	Subtotal	872
REC	Recreation	
01	General	51
03	Value to Individuals, Families, Seniors, Disabled, etc.	13
04	Motorized Recreation (General)	2
07	Non-motorized, Non-mechanized Recreation	17
08	Hiking, Backpacking	37
10	Hunting and Fishing	5
11	Camping, Dispersed	4
13	Canoeing, Kayaking, Rafting, Swimming	29
	Subtotal	158
scv	Social Conditions/Values	
01	General	44
02	Quality of Life (Tradition, Traditional Way of Life)	7
03	American Indian Values/Uses	58
04	Spiritual Values, Solitude	67
)5	Land Value to Future Generations	259
06	Tourism Values	62
07	Cultural Values	131
	Subtotal	628
soc	Species of Concern	
01	General	25
03	Threatened, Endangered, Proposed, Sensitive	47
	Subtotal	72
sog	Soils and Geology	
01	General	25
02	Soil (Productivity, Disturbance, Erosion)	31
04	Paleontological Resources	1
	Subtotal	57



Table 12. Distribution of Public Scoping Comments by Issue Category (Continued)

Code	Description	Comments
TRA	Transportation	
01	General	26
02	Roads Network	8
03	Trucking	4
04	Mineral Transport	10
	Subtotal	48
VEG	Vegetation	
01	General	59
02	Medicinal Plants	2
03	Noxious or Non-native Plants	3
04	Habitat/Vegetation Composition	46
	Subtotal	110
VIS	Scenery, Visual Resources	
01	General	97
02	Mining Operations	6
04	Visibility	8
	Subtotal	111
WAT	Water Resources	·
01	General	132
02	Surface Water	128
03	Groundwater	99
04	Riparian Areas and Wetlands	24
05	Water Quantity	10
06	Water Quality	38
07	Watershed Condition	186
08	Regional Water Source (Drinking or Agriculture)	220
09	Contamination	180
	Subtotal	1,017
WIL	Wildlife General	
01	General	246
02	Genetic Diversity	1
03	Fragmentation, Perforation, and Connectivity	1
05	Terrestrial Game Species	1
06	Birds	3
07	Migratory Birds	1
	Subtotal	253
Total Co	mments	8,695

# 4.5 Resource Advisory Council Comments

The BLM's Arizona Resource Advisory Council (RAC) is a 15-member statewide advisory council that provides advice and recommendations to the BLM on resource and land management issues for approximately 12.2 million acres of federal surface and 36 million acres of subsurface mineral estate in Arizona. The purpose of the RAC is to enable Arizona citizens to have a meaningful say in how public lands are managed. RAC members are selected for their ability to provide informed, objective advice on a variety of public land issues, and their commitment to collaboration in seeking solutions to those issues.

On September 17, 2009, Arizona BLM State Director Jim Kenna requested the RAC provide information and advice regarding issues that the BLM should consider in preparing the EIS for the proposed withdrawal. The following are the RAC recommendations on EIS issues and potential alternatives criteria, which they provided to the BLM on December 9, 2010:

# RAC Issue Summary

If mining is allowed to continue in the proposed withdrawal areas, there is the potential for the following:

- Toxic waste hazards
- Effects on fish, wildlife (including the California condor), and water (including contamination of groundwater, seeps, springs, and streams)
- Impacts to surface and subsurface resources from the development of approximately 8,300 existing mining claims (with associated valid existing rights)
- Impacts to road conditions
- Impact of ore truck traffic on local highways
- Increased dust from use of unpaved roads; there will be a need for dust mitigation

If the proposed withdrawal is put into effect, there is the potential for the following:

- Foregone energy potential (need for full-scale mineral appraisal to accurately assess the subsurface resources that would be foregone by a long-term withdrawal)
- Impacts of using alternative energy sources
- Economic impacts (both beneficial and adverse), particularly on local economies and tourism
- Natural erosion of uranium from breccia pipes could lead to the contamination of landscapes and water
- Loss of significant energy resources

# RAC Potential Alternative Criteria Summary

Keep the mining areas as close to the communities that support mine development as possible.

Consider one or two alternatives that limit the withdrawal to a smaller area, taking into consideration the following factors:

- Protection of natural and cultural resources
- Protection of wildlife habitat and special-status species



- Protection of rangeland health and grazing forage
- Visual resource management classes
- Areas of Critical Environmental Concern
- Air and water quality, aquifers, and hydrology factors, including the potential for groundwater contamination from mining activities
- Potential for surface disturbance, degree of existing access roads, and degree of impact of ore truck traffic on local highways
- Protection of sensitive ecological zones/riparian areas/springs
- Special recreation management areas, trail systems, and recreation management objectives
- Areas with wilderness characteristics
- Location of existing land withdrawals
- Degree of potential mitigation measures needed to minimize resource impacts of mining activities
- Potential for successful reclamation of mining activities
- Location of existing mines
- Land with high potential for locatable minerals, including breccia pipe locations (the EIS should fully consider the unique geology of the Arizona Strip, which supports a favorable concentration of uranium)
- Socioeconomic considerations, such as health of the U.S. mining industry, support to local communities, job creation, etc.
- U.S. strategic interests in uranium and other minerals/metals production (Department of Energy and Department of Defense should collaborate)

No withdrawal from mineral entry, but instead promulgate surface management regulations that are specific to this area to provide the desired level of watershed and other resource protection.

No withdrawal from mineral entry, but aggressively pursue clean-up and reclamation of "legacy mine" sites.

Withdraw and apply existing surface management regulations (43 CFR 3809 [BLM]; 36 CFR 228 [Forest Service]) to mitigate impacts of production of energy minerals from existing mining claims.

Withdraw, but identify and locate alternative energy sources.

Withdraw, but rely on foreign sources or domestic (Indian Country) sources.

# 5.0 PRELIMINARY CONCERNS

This section represents a summary compilation, organized by resource or other applicable category, of environmental and other concerns identified by members of the public and by groups who submitted comments during the scoping period. These concerns will be considered when developing the issues that will be analyzed in the EIS and when developing the alternatives.

# Air Quality

Analyze and fully disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining to air quality. Cumulative effects should be considered in combination with pre-existing emissions from coal plants, cities, traffic, and other sources of regional air pollution.

The EIS should analyze the potential of uranium ore dust to impact air quality and human health. This should include a cumulative analysis of the development of all potential mines in the area.

In addition to mine-site uranium ore dust, trucking uranium ore from mining areas to processing facilities may lead to ore dust impacts to air quality. The EIS should estimate the amount and cumulative impacts of uranium ore dust accumulation along haul routes.

Consider requiring spraying or an alternative dust mitigation method on all dirt roads during times of ore truck traffic.

Continued uranium mining and exploration supports nuclear energy power sources and may result in greater development of clean energy and reduced carbon emissions, thus beneficially impacting climate change.

Clean energy sources from wind and solar are preferable to nuclear energy, which requires uranium resources. The EIS should analyze the impact of removing uranium energy resources on carbon emissions and climate change.

## Alternatives

Alternatives to consider should include 1) limited withdrawal; 2) no withdrawal with conditions; and 3) withdrawal with conditions. All alternatives should consider how development of the approximately 8,300 existing mining claims could impact surface and subsurface resources.

Limited withdrawal alternatives could include keeping mining areas as close as possible to the communities that support mine development or limiting the withdrawal area based on factors such as protection of the resources of concern; location of existing and future roadways to minimize surface disturbance; existing land withdrawals and mines; the type and scope of potential mitigation measures that would be needed; areas with the highest potential for locatable minerals; and consideration of the health of the U.S. mining industry and strategic interests in mineral/metal production.

The no withdrawal alternative should include conditions that promulgate surface management regulations specific to the area or should include conditions to aggressively pursue cleanup and reclamation of "legacy" mines.

The withdrawal alternative should include conditions such as identifying and locating alternative energy sources. It should include an analysis of reliance on foreign energy sources and/or domestic Indian Country energy sources.

## Cultural Resources

Analyze and disclose the controversy and potential impacts of uranium exploration and resulting mining on the cultural values and traditional beliefs of the region's American Indian Tribal members.

Analyze and disclose the cumulative effects of past uranium mining on the region's American Indian Tribes.



Analyze and disclose the potential impacts to Traditional Cultural Properties, archaeological sites, sacred sites, and historic sites. This includes the Red Butte area on the Tusayan Ranger District and the Grand Canyon.

Analyze and disclose the potential impacts to the Havasupai Tribal members living in Supai Village, including the importance of canyon springs and seeps as sacred and religious sites.

## Laws and Policies

The EIS must disclose and analyze the widespread public support for the withdrawal from local, state, federal, and Tribal governments, academic experts, and other organizations and individuals.

Protect the Grand Canyon and other national parks from the harmful impact of hardrock mining. Lands within the Grand Canyon watershed should be withdrawn from new mining claims until Congress decides how to best permanently protect them from uranium mining by reforming the 1872 Mining Law.

Hardrock mining of uranium in areas surrounding the Grand Canyon can wreak havoc on the landscape. Work with Congress to permanently protect this and other American landscapes by reforming the 1872 Mining Law.

BLM already possesses a wide array of effective tools to ensure that the Grand Canyon remains undisturbed and pristine. The type of uranium mining done in the proposed withdrawal area has left a small environmental footprint.

BLM is ignoring its 5-year effort to revise its management plan, which would have kept much of the land in question open for mining activities.

Previous uranium mining within the withdrawal area occurred with little to no environmental impact. Existing laws and policies have shown that they provide adequate environmental protections. Uranium mining in breccia pipes with off-site processing, combined with current regulations, has very little impact. The EIS should analyze and disclose impacts from past uranium mining in the breccia pipe areas and assess the adequacy of existing regulations.

# **Public Health and Safety**

Analyze and fully disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on human health.

Address the potential for toxic waste hazards from uranium mining activities and associated infrastructure development.

The EIS should analyze the potential human health impacts that would accompany the accumulation of uranium in water and dust in the Grand Canyon region and the Colorado River.

Trucking of uranium ore between mining locations and mill facilities would impact public health and safety through the potential for traffic accidents and uranium ore spills on haul routes. The EIS should evaluate the potential for mining-related traffic accidents and the potential frequency of unintended uranium spills.

## Recreation and Visuals

The Grand Canyon provides wilderness backcountry recreation opportunities. Analyze and disclose potential impacts of this mining to Grand Canyon National Park's natural resources, visitor experiences, recreation, and the regional tourism economy.

Protect hunting opportunities offered on the public lands around the Grand Canyon by banning all further uranium mining projects in this area.

Uranium mining and exploration could impact backcountry drinking water sources at area seeps and springs. Analyze and disclose the potential for water contamination and impacts to recreation users, including river runners, backpackers, and hikers in the Park.

Industrialization of the proposed withdrawal area landscape with roads, ore trucks, drill rigs, mines, and other associated machinery would impact the area's visual quality and recreation use patterns and would conflict with the recreation and visual resource management classes. Analyze and disclose how uranium mining and exploration would impact recreation and visual resources.

## Socioeconomics

The proposed plan to block mining on land located near the Park would restrict access to some of America's richest deposits of uranium. The ban would jeopardize America's future energy security and the President's commitment to expanding the role of nuclear power in meeting the nation's clean energy needs. The ban would jeopardize America's economic security by forcing the country to become more reliant on imported uranium.

Analyze the energy potential that would be lost if the proposed withdrawal is put into effect. Analyze the impacts of increased reliance on energy sources other than nuclear. There is the potential to lose significant energy resources, and a full-scale mineral appraisal is needed to accurately assess the subsurface resources.

The proposed ban would impact all types of metal, mineral, and hardrock mining, which are industries that generate thousands of high-paying jobs; it would deter future investing in mining operations.

Mining companies have been allowed to exploit public lands without giving the American people a fair return for use of our lands.

Removing mining and exploration would adversely impact local and regional economies through the loss of jobs and tax revenues.

Mining in the Grand Canyon region may impact the region's tourism economy. The EIS should analyze the regional tourism economy connected to Grand Canyon in terms of jobs, annual revenues, and tax revenues across different tourism sectors.

The EIS should evaluate the economic impact of the potential contamination of Havasupai Springs and the impacts of reduced tourism for the Havasupai Tribe.

The EIS should disclose where mined uranium would be sold, stored, and processed.



## Soil and Water Resources

Fully analyze and disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on soils, surface water, and groundwater and its connections to surface water.

Discuss the scientific uncertainties of the hydrogeology and the connections between groundwater and surface water systems; discuss how these uncertainties can contribute to potential contamination of those systems from mining. Evaluate all the new hydrologic information available from hydrologists and hydrogeologists who have expressed concerns about uranium mining and its potential impact on water resources.

The Colorado River is an important regional water source. The EIS should analyze the potential for hardrock mining of uranium in areas surrounding the Grand Canyon to leak toxic chemicals into the Colorado River and contaminate the water supply of western states.

Uranium mining has the potential to contaminate water in the Grand Canyon region, including seeps and springs, thereby impacting water quality and biotic communities at discharge points. This may pose a risk to present and future biotic and human communities using this water. Human communities include Havasupai Tribal members who live in Supai, Arizona.

The EIS should discuss how the removal of uranium ore from breccia pipes on public lands could be considered a means to mitigate the potential for natural erosion of uranium from the pipes, which could lead to contamination of landscapes and water.

The Grand Canyon watershed provides important water resources to the western states. The threats posed by uranium mining are unjustifiable in such an important international treasure; the withdrawal is needed to protect the park, its watershed, and the surrounding area's ecosystem from new uranium mining claims.

# Special-Status Species

Analyze and fully disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining to sensitive, threatened, endangered, and candidate species.

Address the possible effects on the California condor from uranium mining activities and associated infrastructure development.

# **Transportation**

Consider the road conditions and the impact of ore truck traffic transporting uranium on existing local roadways and highways.

Analyze and disclose how uranium exploration and mining in the area may contribute to conflicts between tourism and mining-associated development and traffic.

The EIS should analyze the total number of ore truck trips that would be required for mining activities and evaluate the direct, indirect, and cumulative effects of trucking on the region's resources. Potential impacts include degraded highway infrastructure, increased traffic volumes, and highway safety concerns.

# Wildlife (General)

Analyze and fully disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on wildlife habitat and dependent, native/endemic animal species in and around the Grand Canyon.

Protect the wildlife and public lands of the Grand Canyon by banning further uranium mining projects in the area.

Analyze the impacts to wildlife that would result from full-scale uranium exploration and mining in the area, including the thousands of existing uranium mining claims north and south of the Park. Include analyses of transportation, noise, visual, mining operations, and groundwater depletion and contamination.

Construction of new roads and transportation of uranium ore could directly and indirectly impact wildlife through vehicle/animal collisions, spread of invasive vegetation, fragmentation of wildlife habitat, and increased recreational use on new roads.

Uranium mining and exploration could impact groundwater resources through groundwater contamination and depletion at springs, caves, seeps, and creeks. The EIS should analyze and disclose species associated with these areas and describe their tolerances, if known, to all contaminants that could result from uranium mining.

# 6.0 FUTURE STEPS IN THE EIS PROCESS

The BLM will use the comments collected during scoping to define issues and to develop a range of alternatives to address those issues which will be analyzed in the EIS. The impacts that could result from implementing the alternatives will be analyzed and documented in a Draft EIS.

The Draft EIS will be made available for public review and is currently scheduled for publication in August 2010. The availability of the Draft EIS will be announced in the *Federal Register* and advertised in the local and regional media. Public comments will be accepted for 45 days, during which public meetings or hearings will be held to receive comments on the adequacy of the Draft EIS. The BLM will review and consider all comments received on the draft EIS. The document will be modified as appropriate based on public comments; all substantive comments and responses will be incorporated into the Final EIS.

At this time, the Final EIS is scheduled to be released in February 2011. The availability of the Final EIS will be announced in the *Federal Register* and advertised in local and regional media. A Record of Decision selecting the alternative to be implemented will be made by the U.S. Department of the Interior no sooner than 30 days after the date the Notice of Availability of the Final EIS is published in the *Federal Register*.



# **APPENDIX A**

Federal Register Notice of Intent

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911 NE. 11th Avenue, Portland, OR 97232–4181.

#### FOR FURTHER INFORMATION CONTACT:

Grant Canterbury, Fish and Wildlife Biologist, at the above address or by telephone (503–231–2071) or fax (503–231–6243).

**SUPPLEMENTARY INFORMATION:** The following applicants have applied for a scientific research permit to conduct certain activities with endangered species under section 10(a)(1)(A) of the Act (16 U.S.C. 1531 *et seq.*). We are soliciting review of and comment on these applications by local, State, and Federal agencies and the public.

#### Permit No. TE188214

Applicant: Richard Pender, Honolulu, Hawaii.

The applicant requests a scientific research permit to remove and reduce to possession *Clermontia pyrularia* ('oha wai) and to take (collect voucher specimens) the pomace fly (*Drosophila heteroneura* and or *D. ochrobasis*) in conjunction with research in the State of Hawaii, for the purpose of enhancing their survival.

#### Permit No. TE003483

Applicant: U.S. Geological Survey, Biological Resources Discipline, Hawaii National Park, Hawaii.

The applicant requests a permit amendment to take (inoculate) the Laysan duck (*Anas laysanensis*) in conjunction with prevention of botulism type C in the State of Hawaii, for the purpose of enhancing its survival.

#### **Public Comments**

Please refer to the permit number for the application when submitting comments.

We are soliciting public review and comment on these recovery permit applications. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

All comments and materials we receive in response to this request will be available for public inspection, by appointment, during normal business hours at the above address.

Dated: August 18, 2009.

#### David J. Wesley,

Acting Regional Director, Region 1, U.S. Fish and Wildlife Service.

[FR Doc. E9–20585 Filed 8–25–09; 8:45 am] **BILLING CODE 4310–55–P** 

#### **DEPARTMENT OF THE INTERIOR**

#### **Bureau of Land Management**

[LLAZ910000.L14300000.ET0000241A; AZA-35138]

Notice of Intent To Prepare an Environmental Impact Statement for a Proposed Withdrawal in the Vicinity of the Grand Canyon, Arizona

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of intent.

**SUMMARY:** The Bureau of Land Management (BLM), Arizona Strip District office is the lead agency on behalf of the BLM and the United States Forest Service for preparing an Environmental Impact Statement (EIS) to address potential effects of a proposed withdrawal of approximately 633,547 acres of BLM-administered public lands and 360,002 acres of National Forest System lands for up to 20 years from location and entry under the Mining Law of 1872. The purpose of the withdrawal, if determined to be appropriate, would be to protect the Grand Canyon watershed from adverse effects of locatable mineral exploration and mining, except for those effects stemming from valid existing rights. The U.S. Forest Service (Kaibab National Forest), National Park Service (Grand Canyon National Park), U.S. Fish and Wildlife Service, and U.S. Geological Survey have been invited and have agreed to participate as cooperating agencies. Additional local state and Federal agencies and Tribes may request cooperating agency status during this process.

**DATES:** By this notice, the BLM is announcing the beginning of the public scoping process for the EIS and soliciting input on the identification of issues. The public scoping period will end on October 26, 2009. During the public scoping period, the BLM solicits public comment on issues, concerns, and opportunities that should be considered in the analysis of the proposed action. Comments on issues, potential impacts, or suggestions for additional alternatives may be submitted in writing to the address listed below. To be considered in the Draft EIS analysis, comments must be received prior to the close of the scoping period or 15 days after the last public meeting, whichever is later.

The BLM will announce public scoping meetings to identify relevant issues through news media, newspapers, and the BLM's Web site. A meeting is planned to be held in Fredonia, Arizona on September 30, 2009, and in Flagstaff, Arizona on October 15, 2009. The time and location of the meetings will be announced at least 30 days in advance by the methods mentioned above. Other meetings will be scheduled and announced at least 15 days in advance by the same methods. Further opportunities for public participation will be provided upon publication of the Draft EIS, including a minimum 45-day public comment period.

**ADDRESSES:** Comments may be submitted by either of the following methods:

• Mail: Grand Canyon Mining Withdrawal Project, ATTN: Scott Florence, District Manager, Bureau of Land Management, Arizona Strip District Office, 345 East Riverside Drive, St. George, UT 84790–6714,

Electronic Mail: azasminerals@blm.gov.

FOR FURTHER INFORMATION CONTACT: For information regarding the EIS process or to have your name added to the mailing list, send requests to Scott Florence, BLM District Manager, 345 East Riverside Drive, St. George, Utah 84790–6714, (435) 688–3200. For information pertaining to the National Forest System Lands included in the proposed withdrawal, contact Michael Williams, Forest Supervisor, Forest Service, Kaibab National Forest, 800 South Sixth Street, Williams, Arizona 86046, (928) 635–8200.

SUPPLEMENTARY INFORMATION: The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, including alternatives. The Secretary of the Interior proposes to withdraw approximately 633, 547 acres of BLMadministered public lands and 360,002 acres of National Forest System lands for up to 20 years from location and entry under the Mining Law of 1872, 30 U.S.C. 22 et seq. The proposed withdrawal applies to Federal locatable minerals, subject to valid existing rights, including locatable minerals that underlie non-Federal surface. It would not apply to non-Federal mineral estate. The purpose of the withdrawal, if determined to be appropriate, would be to protect the Grand Canyon watershed from adverse effects of locatable mineral

exploration and mining, except for those effects stemming from valid existing rights. The EIS will analyze at least two alternatives, including a withdrawal as currently proposed and the "No Action" alternative, which would be to continue to allow location of new mining claims. Other alternatives may be analyzed as appropriate, including withdrawal of a smaller area.

The proposed action is to withdraw, subject to valid existing rights, certain public lands and National Forest System lands from location and entry under the 1872 Mining Law, but not the mineral leasing, geothermal leasing, mineral materials laws, or public land laws. The subject areas were previously described in BLM's Notice of Proposed Withdrawal and Opportunity for Public Meeting; Arizona which published in the **Federal Register** on July 21, 2009 [74 FR 35887]. The map for the ''Petition/Application for Withdrawal'' is available from the BLM Arizona Strip District office and the Forest Service Kaibab National Forest office at the addresses listed above.

The total areas described aggregate approximately 993,549 acres of BLM-administered public lands and National Forest System lands and any Federal locatable minerals underlying non-Federal surface in Coconino and Mohave Counties located adjacent to the Grand Canyon National Park in Arizona. The total non-Federal lands within the area aggregate approximately 85,673 acres in Coconino and Mohave Counties.

If the withdrawal were to be approved by the Secretary of the Interior, the closure to location and entry under the Mining Law would be subject to valid existing rights and authorized in accordance with section 204 of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1714, and the Federal regulations at 43 CFR part 2300.

You may submit comments on issues in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the ADDRESSES section above. To be most helpful, you should submit comments within 15 days after the last public meeting. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

(Authority: 43 CFR part 2300)

#### Helen M. Hankins,

Arizona Associate State Director. [FR Doc. E9–20626 Filed 8–25–09; 8:45 am] BILLING CODE 4310–32–P

#### **DEPARTMENT OF THE INTERIOR**

#### **Bureau of Reclamation**

Notice of Intent To Contract for Hydroelectric Power Development on the South Canal, Uncompangre Project, Colorado

**AGENCY:** Bureau of Reclamation, Interior.

**ACTION:** notice of intent to accept proposals, select lessee, and contract for hydroelectric power development on the South Canal, Uncompanyer Project, Colorado.

**SUMMARY:** Current Federal policy allows non-Federal development of electrical power resource potential on Federal water resource projects. The Bureau of Reclamation (Reclamation) will consider proposals for non-Federal development of hydroelectric power on the South Canal of the Uncompangre Project. Reclamation is considering such hydroelectric power development under a lease of power privilege. No Federal funds will be available for such hydroelectric power development. The Uncompangre Project is a Federal Reclamation project. This Notice presents background information, proposal content guidelines, and information concerning selection of a non-Federal entity to develop hydroelectric power on the South Canal. DATES: A written proposal and seven copies must be submitted on or before 5 p.m. (Mountain Standard Time) on Monday, February 1, 2010. A proposal will be considered timely only if it is received in the office of the Area Manager on or before 5 p.m. on the above-designated date. Interested entities are cautioned that delayed delivery to the Area Manager's office due to failures or misunderstandings of the entity and/or of mail, overnight, or courier services will not excuse lateness and, accordingly, are advised to provide sufficient time for delivery. Late proposals will not be considered. ADDRESSES: Send written proposal and seven copies to Ms. Carol DeAngelis, Area Manager, Bureau of Reclamation, Western Colorado Area Office, 2764 Compass Drive, Suite 106, Grand Junction, Colorado 81506; telephone

FOR FURTHER INFORMATION CONTACT:

(970) 248-0600.

Technical data may be obtained from

Mr. Dan Crabtree, Bureau of Reclamation, Western Colorado Area Office, 2764 Compass Drive, Suite 106, Grand Junction, Colorado 81506; telephone (970) 248–0652. Reclamation will be available to meet with interested entities only upon written request to Mr. Dan Crabtree at the above-cited address. Upon request, Reclamation will provide an opportunity for a site visit. Reclamation reserves the right to schedule a single meeting and/or visit to address the questions of all entities that have submitted questions or requested site visits.

Information related to operation and maintenance of the South Canal may be obtained from Mr. Marc Catlin, Uncompander Valley Water Users Association, P.O. Box 69, Montrose, Colorado 81402; telephone (970) 249—3813.

SUPPLEMENTARY INFORMATION: The Uncompangre Project, located in westcentral Colorado along the Uncompangre River in the Colorado River Basin, was authorized by the Secretary of the Interior on March 14, 1903, under provisions of the Reclamation Act of 1902. After the passage of the Reclamation Act of 1902, the Uncompangre Project was selected for development and the United States began construction in 1904. The Act of June 22, 1938, 52 Stat. 941, authorized the Secretary of the Interior to develop or sell surplus power from the Uncompaĥgre Project. The Uncompangre Valley Water Users Association, under its contracts with the United States, has certain operation, maintenance, and replacement responsibilities and obligations concerning the South Canal and Uncompangre Project.

Reclamation is considering hydroelectric power development on the South Canal under a lease of power privilege. A lease of power privilege is an alternative to Federal hydroelectric power development. A lease of power privilege is a contractual right given to a non-Federal entity to use a Reclamation facility for electric power generation consistent with Reclamation project purposes. Leases of power privilege have terms not to exceed 40 years. The general authority for lease of power privilege under Reclamation law includes, among others, the Town Sites and Power Development Act of 1906 (43 U.S.C. Sec. 522) and the Reclamation Project Act of 1939 (43 U.S.C. 485h(c)) (1939 Act).

Reclamation will be the lead Federal agency for ensuring compliance with the National Environmental Policy Act (NEPA) of any lease of power privilege

# **APPENDIX B**

**Legal Advertisements** 

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# **Affidavit of Publication**

STATE OF UTAH ) (SS. COUNTY OF KANE )

I, Dennis A. Brunner, being duly sworn, depose and say that I am General Manager of the SOUTHERN UTAH NEWS, a weekly newspaper of general circulation for Kane County, Utah and Coconino County, Arizona, and published every Wednesday at Kanab, Utah, and the notice attached hereto,

was published in said newspaper for:

**ONE** 

consecutive weeks, the first publication on:

8/26/09

and the last on:

8/26/09

, Notary Public

that said notice was published in the regular and entire issue of every number of the paper during the period and times of publication, and that the same was published in the newspaper proper and not in a supplement.

Subscribed and sworn to before me

Aug 27, 2009

Residing in Kanab, Utah.

My commission expires: 5.20.2012

SHANNON ALLEN
NOTARY PUBLIC-STATE OF UTAH
COMMISSION# 575136
COMM. EXP. 5-20-2012

**COPY OF NOTICE** 

## NOTICE OF PUBLIC MEETING

The Bureau of Land Management (BLM) is hosting a public meeting on September 30 to provide information and receive input on the recent Department of Interior proposed withdrawal (temporary segregation) on almost 1 million acres of federal lands near the Grand Canyon. The segregation will prevent the location of new mining claims for two years while the Department evaluates whether to withdraw these lands for up to an additional 20 years. During this two-year segregation period, various studies will be conducted and an Environmental Impact Statement (EIS) prepared.

The BLM will be the lead agency, working in cooperation with the U.S. Forest Service, the U.S. Fish and Wildlife Service, the U.S. Geological Survey and the National Park Service to prepare an EIS used to support a final decision on the withdrawal. The EIS will disclose the potential impacts the proposed action would have on the human environment and natural and cultural resources, as well as determine what measures would be necessary to mitigate or reduce those impacts. In addition to analyzing the potential impacts, the EIS will also identify and analyze alternatives to the proposed action.

The meeting will be held on September 30, 6 p.m. to 8 p.m., at the Fredonia Elementary School Cafeteria, 221 E. Hortt, Fredonia, Arizona.

Comments may also be mailed to the Bureau of Land Management, Arizona Strip District, 345 East Riverside Drive, St. George, UT 84790, by sending an email to azasminerals@blm.gov. Additional Information can be found at blm.gov/az or by calling (435) 688-3200.

Published in the Southern Utah News on August 26, 2009.



# News Release

US DEPARTMENT OF THE INTERIOR ■ BUREAU OF LAND MANAGEMENT ARIZONA STRIP DISTRICT ■ 345 EAST RIVERSIDE DRIVE ■ ST. GEORGE, UT 84790

For Release: September 10, 2009

Contact: Scott Sticha, Public Affairs Specialist (435) 688-3303

# Public Invited to Attend Open House Meetings on Proposed Mining Withdrawal

**St. George, Utah** – The Bureau of Land Management (BLM) is hosting public meetings on September 30 and October 15 to provide information and receive input on the recent Department of Interior proposed withdrawal (temporary segregation) of almost 1 million acres of federal lands near the Grand Canyon. The segregation will prevent the location of new mining claims for 2 years while the Department evaluates whether to withdraw these lands for up to an additional 20 years. During this two-year segregation period, various studies will be conducted and an Environmental Impact Statement (EIS) prepared.

The BLM will be the lead agency, working in cooperation with the U.S. Forest Service, the U.S. Fish and Wildlife Service, the U.S. Geological Survey and the National Park Service to prepare an EIS used to support a final decision on the withdrawal. The EIS will disclose the potential impacts the proposed action would have on the human environment and natural and cultural resources, as well as determine what measures would be necessary to mitigate or reduce those impacts. In addition to analyzing the potential impacts, the EIS will also identify and analyze alternatives to the proposed action.

The first meeting will be held on September 30, from 6 p.m. to 8 p.m., at the Fredonia Elementary School Cafeteria, 221 E. Hortt, Fredonia, Arizona. A second meeting will be held in Flagstaff, Arizona on October 15, from 6 p.m. to 8 p.m., at the High Country Conference Center, 201 West Butler Avenue, Flagstaff, Arizona. An open house format will be used for both meetings. This will provide an opportunity to learn about the EIS process and for the public to submit written comments and discuss ideas with agency officials.

Comments may also be mailed to the Bureau of Land Management, Arizona Strip District, 345 East Riverside Drive, St. George, UT 84790, by sending an email to <a href="mailto:azasminerals@blm.gov">azasminerals@blm.gov</a>. Additional Information can be found at blm.gov/az or by calling (435) 688-3200.

The BLM manages more land – 256 million acres – than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The Bureau, with a budget of about \$1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

# **APPENDIX C**

Scoping Meeting Display Boards and Meeting Handouts, September 30, 2009, Fredonia, Arizona This page intentionally left blank.



# Proposed Mineral Withdrawal Environmental Impact Statement



## **Background**

On July 21, 2009, the Secretary of the Interior proposed to withdraw, subject to valid existing rights, approximately 633,547 acres of Bureau of Land Management (BLM) managed public lands on the Arizona Strip District and 360,002 acres of National Forest System Lands on the Kaibab National Forest for up to 20 years from mineral location and entry under the Mining Law of 1872. The notice of proposed withdrawal, which was published in the *Federal Register*, segregated the lands from location and entry for up to 2 years to allow time for various studies and analyses to support a final decision on whether or not to proceed with a withdrawal.

A Notice of Intent (NOI) was published in the *Federal Register* on August 26, 2009, to initiate scoping and preparation of an Environmental Impact Statement (EIS) for the proposed withdrawal.

#### **EIS Process**

The BLM will be the lead agency, working in cooperation with the U.S. Forest Service, the U.S. Fish and Wildlife Service, the U.S. Geological Survey, the National Park Service, and other state, local and tribal agencies to prepare an EIS used to support a final decision on the withdrawal. The EIS will disclose the potential impacts the proposed action would have on the human environment and natural and cultural resources, as well as determine what measures would be necessary to mitigate or reduce those impacts.

In addition to analyzing the potential impacts, the EIS will also identify and analyze alternatives to the proposed action. The EIS will analyze at least two alternatives, the "Proposed Action" to withdraw lands from the location of new mining claims and the "No Action" alternative, which would continue to allow location of new mining claims. Other alternatives may be analyzed as appropriate, including withdrawal of a smaller area.

## **EIS Project Schedule**

- Public Scoping Period (comments due within 15 days of the last scoping meeting): September -October, 2009
- Fredonia Public Meeting: September 30, 2009
- Flagstaff Public Meeting: October 15, 2009
- Resource Studies and Collection of Baseline Data: January 2010
- Prepare Draft Environmental Impact Statement (DEIS): January -August 2010
- DEIS Released for Public Review: August 2010
- Minimum 45-Day Public Comment Period: August September 2010
- Prepare Final EIS: September 2010 January 2011
- FEIS Released: January, 2011
- Record of Decision Signed: March 2011
- Public Land Order to Secretary of Interior: May 2011

## **Preliminary Issues**

#### Air Quality

• Grand Canyon National Park is a Class I air quality park, and is famous for its viewsheds and vistas. Increased mining activity (including increased truck traffic on dirt roads) could increase levels of fugitive dust and degrade air quality in the park and designated/proposed wilderness.

#### **Cultural Resources**

- Mining activity could impact Traditional Cultural Properties.
- Increased mining activity in remote/undisturbed areas could impede access to traditional resources for tribal practitioners.
- The Grand Canyon is considered sacred by many tribes. These tribes would likely consider extractive enterprises in the region to be inconsistent with a sacred location.
- Increased mining activity could affect seeps and springs, locations that are often sacred to tribal members and considered important by traditional practitioners.
- Increased mining activity and development of access roads could lead to vandalism of archeological sites.

#### Soil and Water Resources

- Subsurface water flow may supply water directly to Grand Canyon springs. Faulting and fracturing
  can create conduits to transport contaminated water quickly from a mining site to the park's
  springs.
- Is the elevated dissolved uranium found on sites in the vicinity of historic mines naturally occurring or related to past mining activities? If it is related to past mining activities, how would future uranium mining affect water quality?
- The mining of uranium ore in breccia pipes on lands adjacent to Grand Canyon National Park could cause contamination of ground-water and surface-water resources.
- Surface-water or stream sediment contamination could occur by erosion of waste rock during flash floods.

## Special Designations (Areas of Critical Environmental Concern and Wilderness)

- Designated or proposed wilderness adjacent to each of the three parcels could be impacted by degraded air quality, industrial noise impacts to natural sounds, impacts to viewsheds and vistas from installation of infrastructure, and clearing and grading for roads.
- Increased roads may increase the potential for illegal access and trespass by motorized vehicles and other unauthorized uses into designated and proposed wilderness.
- Mining activities could impact the relevant and important values (i.e., cultural resources, special status species, riparian, and scenic) that Areas of Critical Environmental Concern were designated to protect.

#### Recreation

- Increased truck traffic on the Toroweap Road and other visitor access roads could create conflicts with recreationists in the area.
- Increased mining activity in remote/undisturbed areas could impact opportunities for primitive types of recreation.

#### Visual Resources and Soundscapes

• Mining infrastructure may be visible from within Grand Canyon National Park, adjacent designated wilderness, and areas managed to maintain wilderness characteristics.

- Mine development may not meet the Visual Resource Management class or Scenery Management System objectives.
- Increased dirt roads could result in increased dust and impacts to visibility.
- There is the potential for increased noise from mining activities and various types of motor vehicles servicing the mines in two quiet zones (i.e. over-flight free) within Grand Canyon National Park.
- There is the potential for increased over-flights associated with mining exploration and operations could impact Grand Canyon airspace and as a result increase the frequency and duration of aircraft noise in areas popular for backpacking and river rafting.

#### Wildlife

- Mining exploration may lead to increased roads that fragment habitat and prey populations. This
  has the potential to affect wildlife species.
- Increases in wildlife poaching within and near the park boundary have been associated with increased mining exploration activities in previous years.
- Noise events and activity associated with mining operations have the potential to affect wildlife movement and foraging patterns.
- Seeps and springs within Grand Canyon drainages are critical to wildlife. Contamination of these water sources from mining activities could affect the health of wildlife.

### Special Status Species

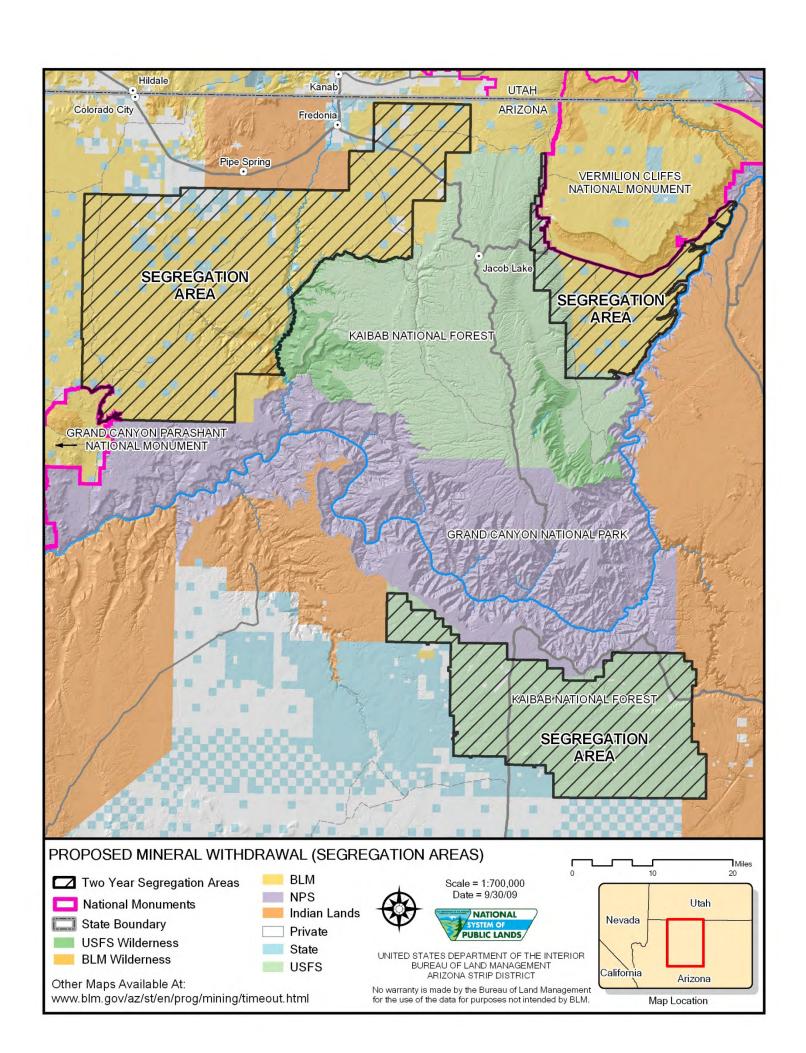
- Mining exploration may lead to increased roads that fragment habitat and prey populations. This has the potential to affect special status species.
- California condors (an experimental non-essential population in the proposed withdrawal area) are known to be attracted to construction activities and other disturbance activities and could be attracted to mining activities, putting these animals at risk.
- Noise events and activity associated with mining operations have the potential to affect wildlife movement and foraging patterns.
- Seeps and springs within Grand Canyon drainages are critical to wildlife. Contamination of these water sources from mining activities could affect the health of wildlife.

#### **Public Health and Safety**

- Radon and gamma radiation occurs in active and abandoned mine workings and is emitted from
  mine waste piles. These mine and surface waste rocks are commonly used as backfill in the mine,
  which could affect public health and safety.
- Transporting uranium ore from a mine site to the mill near Blanding, Utah could result in public health and safety concerns if an ore spill occurs.
- Long-term mining activities (and associated radon and gamma radiation) could affect the health of
  the Kaibab Paiute Tribe which is immediately adjacent to the North Parcel. Hauling of ore from
  mines in this parcel would likely occur on the Toroweap Road, which passes through a portion of this
  reservation.

## Socioeconomic Environment

• An estimated 200 to 400 breccia pipes occur in the three proposed withdrawal parcels. On the basis of historical uranium mining in the Grand Canyon area, the average grade for these deposits is in the range of 0.40-0.70% U<sub>3</sub>O<sub>8</sub>. This is significantly higher than almost all of the other uranium reserves in the United States, which have an average grade of about 0.18%. It is thought that most of the high-grade undiscovered uranium resources in the United States are contained in these breccia pipes. Thus, withdrawing the area from uranium mining would have economic impacts on the local communities and may have social and economic effects that are regional or national.



## **Open House Public Meeting Format**

An open house format will be used to provide an opportunity to learn about the EIS process and for the public to submit written comments and discuss ideas with agency officials.

## **Providing Comments**

The purpose of public scoping is to determine if there are specific issues that should be considered in the environmental analysis or to inform alternative development. Please use the form on the back of this page to provide comments. You can also email comments to <a href="mailto:azasminerals@blm.gov">azasminerals@blm.gov</a> or mail your comments to: Bureau of Land Management, Mineral Withdrawal EIS, 345 E. Riverside Drive, St. George, UT 84790. Comments must be submitted within 15 days of the last scoping meeting.

Public comments, including names and street addresses of respondents, will be available for public review at the Arizona Strip Field Office, 345 E. Riverside Drive, St. George, UT 84790, during regular business hours (7:45 a.m. to 5:00 p.m.), Monday through Friday, except holidays.

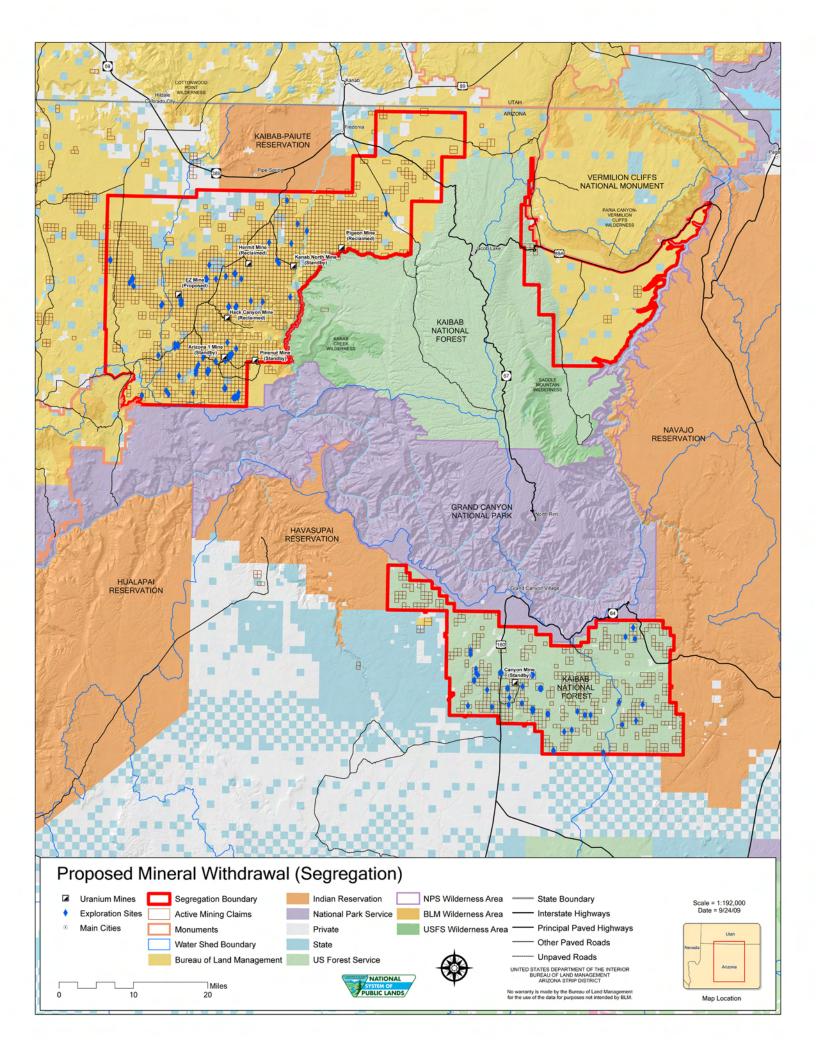
Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently. Such requests will be honored to the extent allowed by law. All comments by organizations or businesses will be made available for public inspection in their entirety.

fold here to mail	
	Put
	Stamp Here
	Here

Bureau of Land Management Mineral Withdrawal EIS 345 E. Riverside Drive St. George, UT 84790

# **Public Comment Form**

Please complete the following:
Name
Address
<del></del>
E-mail Address
Withhold my name and address from public review
I want to be added to a mailing list to receive information via e- mail during the EIS preparation
I want to be added to a mailing list to receive information via <b>regular mail</b> during the EIS preparation
Please provide substantive comments, factual information, and other constructive input to help improve the EIS. Attach additional pages if necessary.



URANIUM MINERALIZATION OF THIS TYPE FOUND ON THE ARIZOMA STRIP LENDS ITSELF TO DEVELOPMENT AND PRODUCTION WITH A MINIMUM OF SURFACE IMPACT. DUE TO THE NATURE OF THE DEPOSIT AS SHOWN HERE, A MINE CAN BE DEVELOPED AND MINED OUT WITH SURFACE DISTURBANCE AVERAGING ABOUT 15-58 CARES. THE OPERATION EXTENDS OVER A PERIOD OF 5 TO 10 YEARS INCLUDING DEVELOPMENT, MINIMG AND REMABILITATION. THE LIMITED SURFACE IMPACT IS IN GREAT CONTRAST TO THE CHANNEL TYPE DEPOSITS COMMONLY KNOWN IN THE PLATEAUS OF ARIZONA, UTAH, COLORADO AND WYONING.

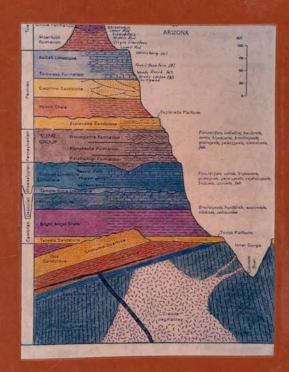


FIG. 1 TYPICAL STRATIGRAPHIC SECTION OF THE GRAND CANYON.

THE URANIUM MINERALIZATION THAT OCCURS IS FOUND FROM
THE COCONINO SANDSTONE DOWN THROUGH THE SUPAI GROUP.

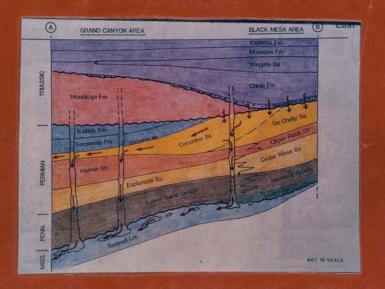


FIG. 2 SCHEMATIC CROSS SECTION DURING TRIASSIC TIME DEPICTING
POSSIBLE URANIUM MOVEMENT FROM THE TRIASSIC FORMATIONS
BY GROUND WATER INTO THE UNDERLYING BRECCIA PIPES
WITHIN THE PENNSYLVANIAN AND PERMIAN DEPOSITS.

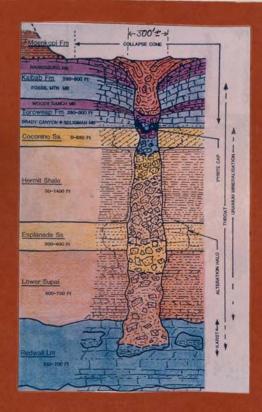


FIG. 3 TYPICAL BRECCIA PIPE OF THE TYPE THAT SERVES AS HOST FOR THE URANIUM MINERALIZATION IN THE DISTRICT. THIS FEATURE HAS DEVELOPED AS A RESULT OF GROUND WATER SOLUTION IN THE REDWALL LIMESTONE CAUSING A CAVERNOUS CONDITION WHICH OVER MILLIONS OF YEARS HAS COLLAPSED FROM ABOVE, CAUSING A CHIMNEY-LIKE FEATURE FILLED WITH RUBBLE.

# Uranium Mining



AS REQUIRED BY SEVERAL ACTS OF CONGRESS, IT IS THE POLICY OF THE BUREAU OF LAND MANAGEMENT (BLM) TO ACTIVELY ENCOURAGE AND FACILITATE THE DEVELOPMENT OF MINERAL RESOURCES WHICH OCCUR ON PUBLIC LANDS IN A MANNER THAT SATISFIES NATIONAL AND LOCAL NEEDS AND PROVIDES FOR ECONOMICALLY AND ENVIRONMENTALLY SOUND EXPLORATION, EXTRACTION, AND RECLAMATION PRACTICES. THIS MUST BE ACCOMPLISHED BY BLM USING THE PRINCIPLES OF BALANCED MULTIPLE USE MANAGEMENT.

THE MINING OF LOCATABLE MINERALS IS PROHIBITED BY BLM ONLY
IN INSTANCES WHERE A PROPOSAL WOULD CAUSE UNNECESSARY OR UNDUE
DEGRADATION OF PUBLIC LANDS, OR WHERE THE LANDS ARE NOT OPEN TO
THE OPERATION OF THE 1872 MINING LAW.

THE MOST PRODUCTIVE DEPOSITS OF URANIUM IN THE ARIZONA STRIP DISTRICT OCCUR IN GEOLOGIC STRUCTURES KNOWN AS BRECCIA PIPES.

URANIUM MINERALIZATION IN THESE STRUCTURES IS AMONG THE HIGHEST PRESENTLY BEING MINED IN THE UNITED STATES.

ENERGY FUELS NUCLEAR, INC. IS NOW OPERATING TWO URANIUM MINES IN THE ARIZONA STRIP DISTRICT (PIGEON AND KANAB NORTH).

THREE ADDITIONAL EFN MINES ARE IN VARIOUS STAGES OF DEVELOPMENT.

THE FIRM RECENTLY RECLAIMED THREE FORMER MINE SITES IN HACK CANYON.

PUBLIC INPUT IS SOUGHT, RECEIVED AND CONSIDERED IN ALL ENVIRONMENTAL ANALYSES FOR URANIUM MINING ON THE ARIZONA STRIP.







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# **APPENDIX D**

Scoping Meeting Display Boards and Meeting Handouts, October 15, 2009, Flagstaff, Arizona This page intentionally left blank.



# Proposed Mineral Withdrawal Environmental Impact Statement



# **Background**

On July 21, 2009, the Secretary of the Interior proposed to withdraw, subject to valid existing rights, approximately 633,547 acres of Bureau of Land Management (BLM) managed public lands on the Arizona Strip District and 360,002 acres of National Forest System Lands on the Kaibab National Forest for up to 20 years from mineral location and entry under the Mining Law of 1872. The notice of proposed withdrawal, which was published in the *Federal Register*, segregated the lands from location and entry for up to 2 years to allow time for various studies and analyses to support a final decision on whether or not to proceed with a withdrawal.

A Notice of Intent (NOI) was published in the *Federal Register* on August 26, 2009, to initiate scoping and preparation of an Environmental Impact Statement (EIS) for the proposed withdrawal.

## **EIS Process**

The BLM will be the lead agency, working in cooperation with the U.S. Forest Service, the U.S. Fish and Wildlife Service, the U.S. Geological Survey, the National Park Service, and other state, local and tribal agencies to prepare an EIS used to support a final decision on the withdrawal. The EIS will disclose the potential impacts the proposed action would have on the human environment and natural and cultural resources, as well as determine what measures would be necessary to mitigate or reduce those impacts.

In addition to analyzing the potential impacts, the EIS will also identify and analyze alternatives to the proposed action. The EIS will analyze at least two alternatives, the "Proposed Action" to withdraw lands from the location of new mining claims and the "No Action" alternative, which would continue to allow location of new mining claims. Other alternatives may be analyzed as appropriate, including withdrawal of a smaller area.

# **EIS Project Schedule**

- Public Scoping Period (comments due within 15 days of the last scoping meeting): September -October, 2009
- Fredonia Public Meeting: September 30, 2009
- Flagstaff Public Meeting: October 15, 2009
- Resource Studies and Collection of Baseline Data: January 2010
- Prepare Draft Environmental Impact Statement (DEIS): January -August 2010
- DEIS Released for Public Review: August 2010
- Minimum 45-Day Public Comment Period: August September 2010
- Prepare Final EIS: September 2010 January 2011
- FEIS Released: January, 2011
- Record of Decision Signed: March 2011
- Public Land Order to Secretary of Interior: May 2011

# **Preliminary Issues**

# Air Quality

• Grand Canyon National Park is a Class I air quality park, and is famous for its viewsheds and vistas. Increased mining activity (including increased truck traffic on dirt roads) could increase levels of fugitive dust and degrade air quality in the park and designated/proposed wilderness.

## **Cultural Resources**

- Mining activity could impact Traditional Cultural Properties.
- Increased mining activity in remote/undisturbed areas could impede access to traditional resources for tribal practitioners.
- The Grand Canyon is considered sacred by many tribes. These tribes would likely consider extractive enterprises in the region to be inconsistent with a sacred location.
- Increased mining activity could affect seeps and springs, locations that are often sacred to tribal members and considered important by traditional practitioners.
- Increased mining activity and development of access roads could lead to vandalism of archeological sites.

### Soil and Water Resources

- Subsurface water flow may supply water directly to Grand Canyon springs. Faulting and fracturing
  can create conduits to transport contaminated water quickly from a mining site to the park's
  springs.
- Is the elevated dissolved uranium found on sites in the vicinity of historic mines naturally occurring or related to past mining activities? If it is related to past mining activities, how would future uranium mining affect water quality?
- The mining of uranium ore in breccia pipes on lands adjacent to Grand Canyon National Park could cause contamination of ground-water and surface-water resources.
- Surface-water or stream sediment contamination could occur by erosion of waste rock during flash floods.

# Special Designations (Areas of Critical Environmental Concern and Wilderness)

- Designated or proposed wilderness adjacent to each of the three parcels could be impacted by degraded air quality, industrial noise impacts to natural sounds, impacts to viewsheds and vistas from installation of infrastructure, and clearing and grading for roads.
- Increased roads may increase the potential for illegal access and trespass by motorized vehicles and other unauthorized uses into designated and proposed wilderness.
- Mining activities could impact the relevant and important values (i.e., cultural resources, special status species, riparian, and scenic) that Areas of Critical Environmental Concern were designated to protect.

# Recreation

- Increased truck traffic on the Toroweap Road and other visitor access roads could create conflicts with recreationists in the area.
- Increased mining activity in remote/undisturbed areas could impact opportunities for primitive types of recreation.

## Visual Resources and Soundscapes

• Mining infrastructure may be visible from within Grand Canyon National Park, adjacent designated wilderness, and areas managed to maintain wilderness characteristics.

- Mine development may not meet the Visual Resource Management class or Scenery Management System objectives.
- Increased dirt roads could result in increased dust and impacts to visibility.
- There is the potential for increased noise from mining activities and various types of motor vehicles servicing the mines in two quiet zones (i.e. over-flight free) within Grand Canyon National Park.
- There is the potential for increased over-flights associated with mining exploration and operations
  could impact Grand Canyon airspace and as a result increase the frequency and duration of aircraft
  noise in areas popular for backpacking and river rafting.

## Wildlife

- Mining exploration may lead to increased roads that fragment habitat and prey populations. This
  has the potential to affect wildlife species.
- Increases in wildlife poaching within and near the park boundary have been associated with increased mining exploration activities in previous years.
- Noise events and activity associated with mining operations have the potential to affect wildlife movement and foraging patterns.
- Seeps and springs within Grand Canyon drainages are critical to wildlife. Contamination of these water sources from mining activities could affect the health of wildlife.

# Special Status Species

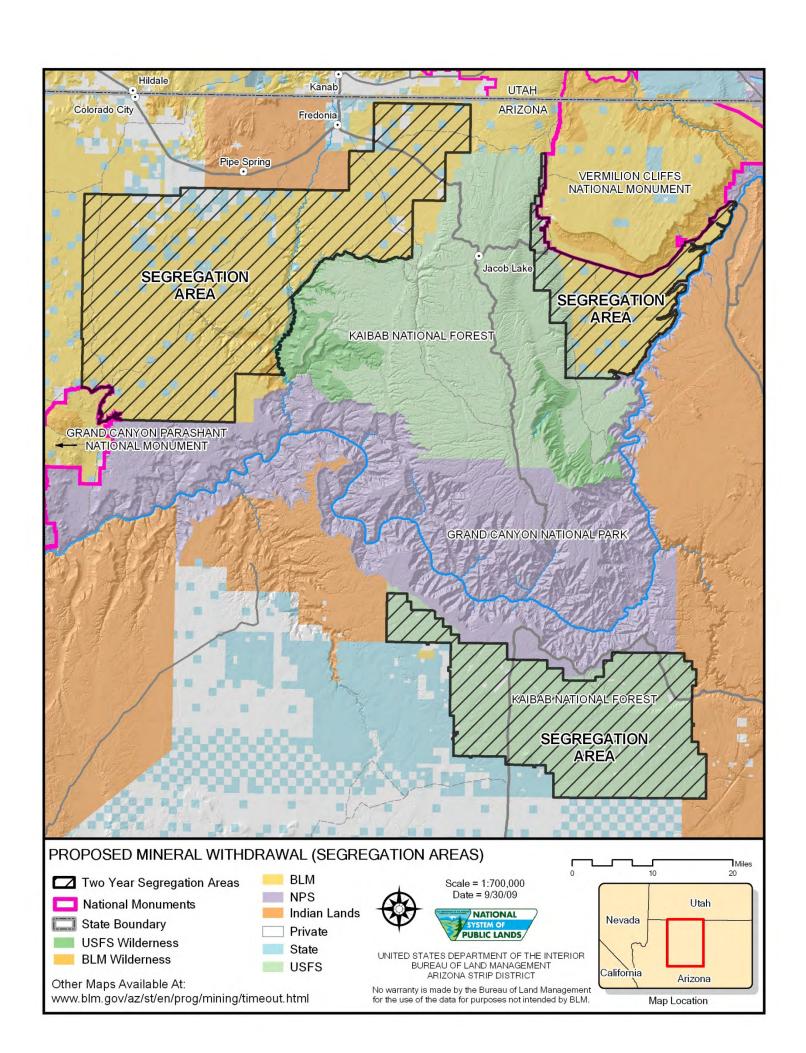
- Mining exploration may lead to increased roads that fragment habitat and prey populations. This has the potential to affect special status species.
- California condors (an experimental non-essential population in the proposed withdrawal area) are known to be attracted to construction activities and other disturbance activities and could be attracted to mining activities, putting these animals at risk.
- Noise events and activity associated with mining operations have the potential to affect wildlife movement and foraging patterns.
- Seeps and springs within Grand Canyon drainages are critical to wildlife. Contamination of these water sources from mining activities could affect the health of wildlife.

### **Public Health and Safety**

- Radon and gamma radiation occurs in active and abandoned mine workings and is emitted from
  mine waste piles. These mine and surface waste rocks are commonly used as backfill in the mine,
  which could affect public health and safety.
- Transporting uranium ore from a mine site to the mill near Blanding, Utah could result in public health and safety concerns if an ore spill occurs.
- Long-term mining activities (and associated radon and gamma radiation) could affect the health of
  the Kaibab Paiute Tribe which is immediately adjacent to the North Parcel. Hauling of ore from
  mines in this parcel would likely occur on the Toroweap Road, which passes through a portion of this
  reservation.

# Socioeconomic Environment

• An estimated 200 to 400 breccia pipes occur in the three proposed withdrawal parcels. On the basis of historical uranium mining in the Grand Canyon area, the average grade for these deposits is in the range of 0.40-0.70% U<sub>3</sub>O<sub>8</sub>. This is significantly higher than almost all of the other uranium reserves in the United States, which have an average grade of about 0.18%. It is thought that most of the high-grade undiscovered uranium resources in the United States are contained in these breccia pipes. Thus, withdrawing the area from uranium mining would have economic impacts on the local communities and may have social and economic effects that are regional or national.



# **Open House Public Meeting Format**

An open house format will be used to provide an opportunity to learn about the EIS process and for the public to submit written comments and discuss ideas with agency officials.

# **Providing Comments**

The purpose of public scoping is to determine if there are specific issues that should be considered in the environmental analysis or to inform alternative development. Please use the form on the back of this page to provide comments. You can also email comments to <a href="mailto:azasminerals@blm.gov">azasminerals@blm.gov</a> or mail your comments to: Bureau of Land Management, Mineral Withdrawal EIS, 345 E. Riverside Drive, St. George, UT 84790. Comments must be submitted within 15 days of the last scoping meeting.

Public comments, including names and street addresses of respondents, will be available for public review at the Arizona Strip Field Office, 345 E. Riverside Drive, St. George, UT 84790, during regular business hours (7:45 a.m. to 5:00 p.m.), Monday through Friday, except holidays.

Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently. Such requests will be honored to the extent allowed by law. All comments by organizations or businesses will be made available for public inspection in their entirety.

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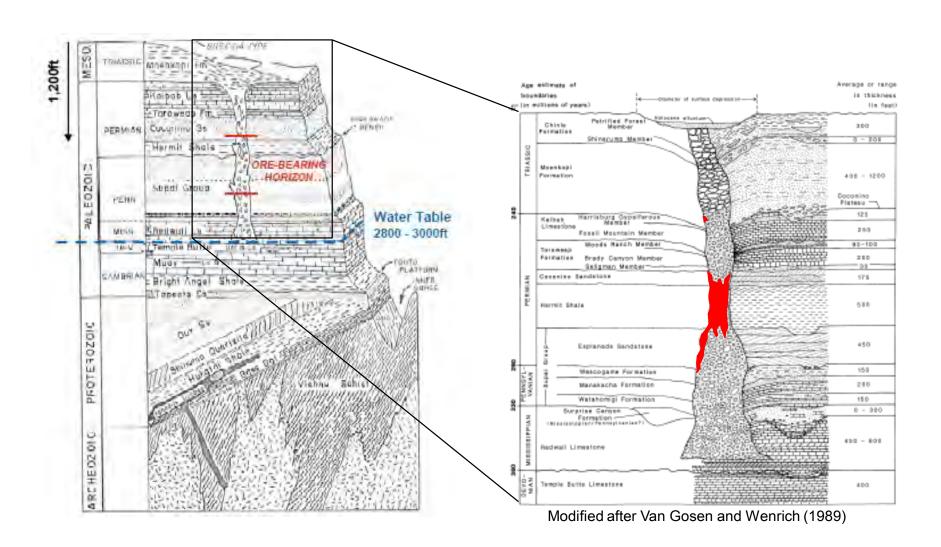
Put Stamp Here

Bureau of Land Management Mineral Withdrawal EIS 345 E. Riverside Drive St. George, UT 84790

# **Public Comment Form**

Please complete the following:
Name
Address
E-mail Address
Withhold my name and address from public review
I want to be added to a mailing list to receive information via <b>e- mail</b> during the EIS preparation
I want to be added to a mailing list to receive information via regular mail during the EIS preparation
Please provide substantive comments, factual information, and other constructive input to help improve the EIS. Attach additional pages if necessary.

# Breccia Pipe Geology





# Potential Effects of Uranium Mining near Grand Canyon, Arizona— U.S. Geological Survey Study Plans

Study Plan I—Uranium resource availability in the Grand Canyon resource areas

Study Plan II—Geologic map of the House Rock Valley area, Coconino County, northern Arizona

Study Plan III—Impact of 1980s legacy uranium mining and mine development operations in the Grand Canyon area

Study Plan IV—Impact of 1980s legacy mining and mine development operations in the Grand Canyon area: Water chemistry and natural uranium activity of perennial and intermittent streamflow and springs from tributaries to the Colorado River, Arizona

Study Plan V—Impact of 1980s legacy mining and mine development operations in the Grand Canyon area: hydrologic studies of the Kanab Creek Basin and adjacent areas, Coconino and Mohave Counties, Arizona

Study Plan VI—Biological pathways of exposure and toxicity thresholds for uranium associated with proposed mining in the area near the Grand Canyon

# For more information:

Andrea Alpine U. S. Geological Survey Southwest Biological Science Center 2255 N Gemini Dr. MS 9394 Flagstaff, AZ 86001 (928) 556-7094

U.S. Department of the Interior U.S. Geological Survey

# **Information Sheet**

# Prepared September 23, 2009

On July 20, 2009, Secretary of the Interior Salazar announced a proposal to withdraw nearly 1 million acres of Federal lands in the Arizona Strip and Kaibab National Forest from new hardrock mineral mining claims for 20 years. The proposal includes 633,547 acres managed by Interior's Bureau of Land Management (BLM) and 360,002 acres managed by the U.S. Forest Service adjacent to Grand Canyon National Park in northern Arizona (fig. 1). The lands are within portions of the Grand Canyon watershed and contain significant environmental and cultural resources as well as substantial uranium deposits. Lands proposed for withdrawal are immediately segregated, or restricted from new mining claims, for up to 2 years.

During the 2-year segregation period, studies and analyses will be conducted to determine if the lands should be withdrawn to protect the area from new mining claims, particularly the effects of uranium mining. In accordance with the National Environmental Policy Act, the BLM, announced August 26, 2009, its intent to prepare an Environmental Impact Statement (EIS) to address the potential effects of the proposed withdrawal. The U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, and the U.S. Geological Survey (USGS) have agreed to participate in the EIS process as cooperating agencies.

Some of the highest grade uranium ore in the United States is located in mineralized breccia pipes scattered across northern Arizona. An increase in uranium prices since 2000, which caused the *average annual* price per pound of uranium ( $\rm U_3O_8$ ) to jump from \$8.20 in 2000 to a high of \$99.33 in 2007, created a flurry of mining exploration in northern Arizona. As a result, 8,482 mining claims (7,473 on BLM lands and 1,009 on U.S. Forest Service lands) are located in the proposed withdrawal area and several uranium mining operations await State of Arizona environmental permits. Neither segregation nor the proposed withdrawal would prohibit ongoing or future mining operations on valid preexisting claims.

The purpose of the withdrawal, if determined to be appropriate, according the August 26, 2009, Federal Register announcement is "to protect the Grand Canyon watershed from adverse effects of locatable mineral exploration and mining, except for those effects stemming from valid existing rights." In terms of the watershed, there are concerns that uranium mining near the park could result in radioactive materials and heavy metals being added to the surface water and groundwater that flows into Grand Canyon National Park and the lower Colorado River. Dissolved uranium and other major, minor, and trace elements occur naturally in groundwater as precipitation infiltrates from the surface to water-bearing zones and, presumably, to the Redwall-Muav aquifer. However, there is concern that digging into the breccia pipes, cylindrical vertical rock formations in which uranium is found, can mobilize the uranium, causing it to be carried by water moving through the rock strata into the Redwall-Muav aquifer and other aquifers, which eventually discharge into seeps and springs.

In support of the EIS process, the USGS will undertake six studies to investigate the extent of uranium resources within the proposed withdrawal area, to determine the effects of uranium mining on surface water and groundwater, and to identify the species and habitats vulnerable to uranium and associated elements as well as the pathways for exposure.

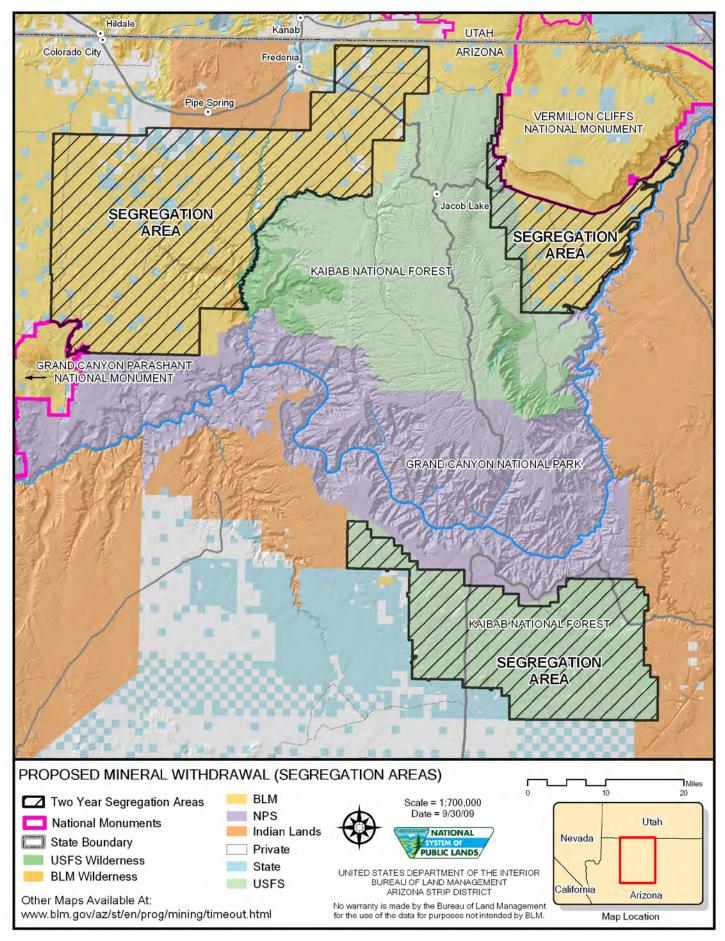


Figure 1. Map of segregated lands in northern Arizona. Map provided by the Bureau of Land Management.

# WELCOME

# Proposed Mineral Withdrawal Environmental Impact Statement Public Scoping Meeting

- Please Sign In here and take Information Sheet and Comment Form.
- Visit stations to review posters and ask questions of agency personnel.
- 3. Agencies include:
  - · Bureau of Land Management
  - U.S. Forest Service, Kaibab National Forest
  - U.S. Geological Survey
  - · National Park Service
  - · U.S. Fish and Wildlife Service
- 4. Please provide your comments by either:
  - · leaving in box
  - mailing to: Bureau of Land Management Mineral Withdrawal EIS

345 E. Riverside Drive St. George, UT 84790

emailing to: azasminerals@blm.gov

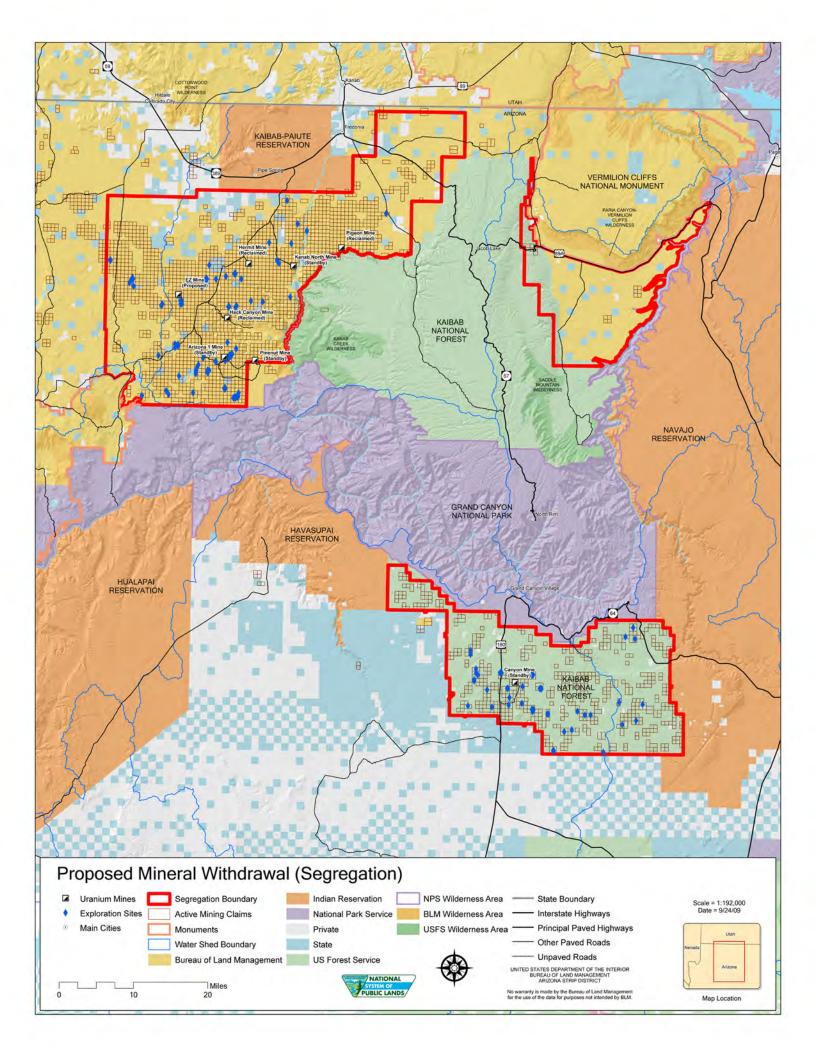




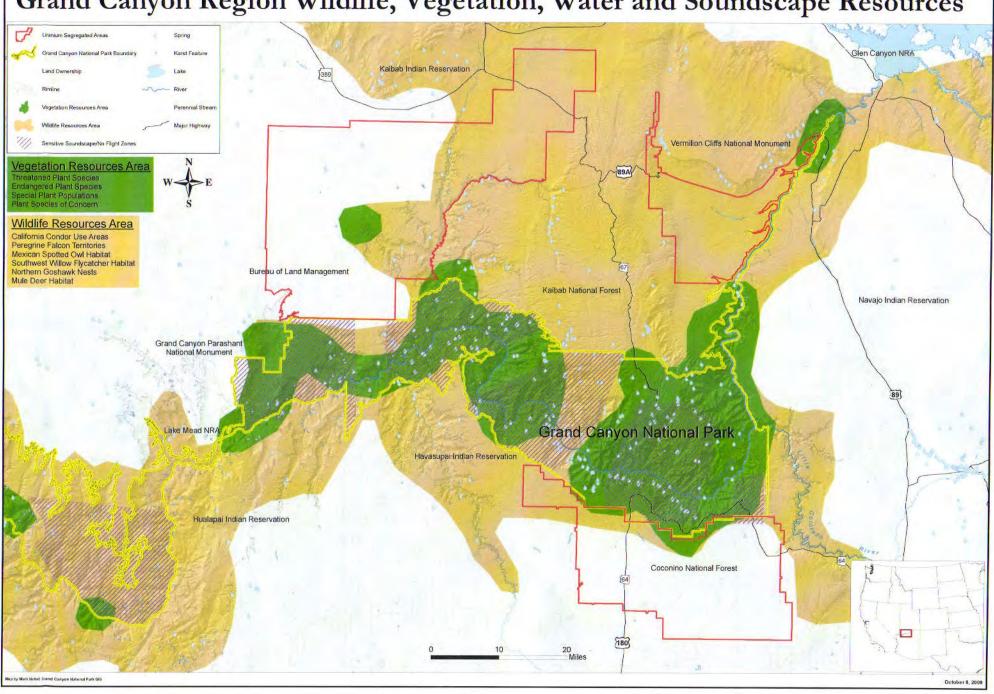








# Grand Canyon Region Wildlife, Vegetation, Water and Soundscape Resources



Manufacture Country of the Country o

FIG. 1 TYPICAL STRATIGRAPHIC SECTION OF THE GRAND CANYON.

THE URANIUM MINERALIZATION THAT OCCURS IS FOUND FROM
THE COCONINO SANDSTONE DOWN THROUGH THE SUPAI GROUP.

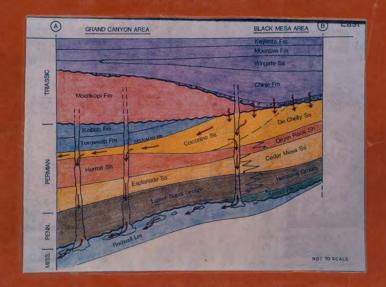
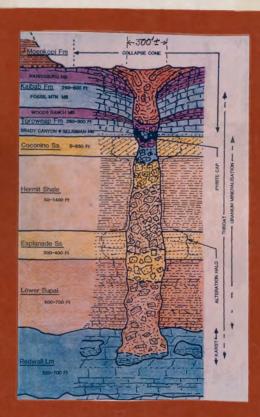


FIG. 2 SCHEMATIC CROSS SECTION DURING TRIASSIC TIME DEPICTING POSSIBLE URANIUM MOVEMENT FROM THE TRIASSIC FORMATIONS BY GROUND WATER INTO THE UNDERLYING BRECCIA PIPES WITHIN THE PENNSYLVANIAN AND PERMIAN DEPOSITS.



URANIUM MINERALIZATION OF THIS TYPE FOUND ON THE ARIZONA STRIP LENDS ITSELF TO 
DEVELOPMENT AND PRODUCTION WITH A MINIMUM OF SURFACE IMPACT. DUE TO THE 
NATURE OF THE DEPOSIT AS SHOWN HERE, A MINE CAN BE DEVELOPED AND MINED OUT 
WITH SURFACE DISTURBANCE AVERAGING ABOUT 15-25 ACRES. THE OPERATION EXTENDS 
OVER A PERIOD OF 5 TO 10 YEARS INCLUDING DEVELOPMENT, MINING AND 
REMABILITATION. THE LIMITED SURFACE IMPACT IS IN GREAT CONTRAST TO THE 
CHANNEL TYPE DEPOSITS COMPROMEY KNOWN IN THE PLATEAUS OF ARIZONA, UTAH.

COLORADO AND WYOMING.

FIG. 3 TYPICAL BRECCIA PIPE OF THE TYPE THAT SERVES AS HOST FOR THE URANIUM MINERALIZATION IN THE DISTRICT. THIS FEATURE HAS DEVELOPED AS A RESULT OF GROUND WATER SOLUTION IN THE REDWALL LIMESTONE CAUSING A CAVERNOUS CONDITION WHICH OVER MILLIONS OF YEARS HAS COLLAPSED FROM ABOVE, CAUSING A CHIMNEY-LIKE FEATURE FILLED WITH RUBBLE.

# Uranium Mining



AS REQUIRED BY SEVERAL ACTS OF CONGRESS, IT IS THE POLICY OF THE BUREAU OF LAND MANAGEMENT (BLM) TO ACTIVELY ENCOURAGE AND FACILITATE THE DEVELOPMENT OF MINERAL RESOURCES WHICH OCCUR ON PUBLIC LANDS IN A MANNER THAT SATISFIES NATIONAL AND LOCAL NEEDS AND PROVIDES FOR ECONOMICALLY AND ENVIRONMENTALLY SOUND EXPLORATION, EXTRACTION, AND RECLAMATION PRACTICES. THIS MUST BE ACCOMPLISHED BY BLM USING THE PRINCIPLES OF BALANCED MULTIPLE USE MANAGEMENT.

THE MINING OF LOCATABLE MINERALS IS PROHIBITED BY BLM ONLY IN INSTANCES WHERE A PROPOSAL WOULD CAUSE UNNECESSARY OR UNDUE DEGRADATION OF PUBLIC LANDS, OR WHERE THE LANDS ARE NOT OPEN TO THE OPERATION OF THE 1872 MINING LAW.

THE MOST PRODUCTIVE DEPOSITS OF URANIUM IN THE ARIZONA STRIP DISTRICT OCCUR IN GEOLOGIC STRUCTURES KNOWN AS BRECCIA PIPES.

URANIUM MINERALIZATION IN THESE STRUCTURES IS AMONG THE HIGHEST PRESENTLY BEING MINED IN THE UNITED STATES.

ENERGY FUELS NUCLEAR, INC. IS NOW OPERATING TWO URANIUM MINES IN THE ARIZONA STRIP DISTRICT (PIGEON AND KANAB NORTH).

THREE ADDITIONAL EFN MINES ARE IN VARIOUS STAGES OF DEVELOPMENT.

THE FIRM RECENTLY RECLAIMED THREE FORMER MINE SITES IN HACK CANYON.

PUBLIC INPUT IS SOUGHT, RECEIVED AND CONSIDERED IN ALL ENVIRONMENTAL ANALYSES FOR URANIUM MINING ON THE ARIZONA STRIP.







# **APPENDIX E**

Form Letter Text

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# Appendix E. Form Letters

# Form Letter Form Letter Text

#### Form Letter 1

Thank you for taking emergency action to protect America's most iconic landmark, the Grand Canyon National Park and the valuable watershed and ecosystem that surround it from new mining. I ask you to make this protection long-term by withdrawing 1 million acres around its boundaries from new mining claims.

I also call on you, as a chief steward of our natural heritage, to play a leadership role in ensuring the Grand Canyon and other national parks and special places are protected from the harmful impacts of hardrock mining on a permanent basis through reform of the 1872 Mining Law. By modernizing this outdated statute, we can ensure America's most treasured lands will remain a legacy for generations to come.

Please consider this as an official comment on the "Notice of Proposed Withdrawal" that appeared in the Federal Register on July 21, 2009 (Volume 74, Number 138).

#### Form Letter 2

I am writing in support of the Department of Interior's proposal to withdraw from mineral entry nearly 1 million acres of public land in the watersheds surrounding Grand Canyon National Park. The withdrawal is needed to protect the park and its watersheds from new uranium mining claims and the impacts that would attend developing the more than 10,000 claims that have already been staked.

The greater Grand Canyon ecosystem is an international treasure. Its vast wilderness provides unparalleled backcountry recreation opportunities; the Colorado River, which flows through it, provides drinking water to 25 million Americans; and its diverse habitats, ranging from upland deserts to verdant springs and creeks, support thousands of species -- many that are threatened or endangered, and others found nowhere else on earth.

Interior's environmental impact statement must rigorously evaluate the environmental consequences that would attend not enacting the withdrawal, leaving those lands open to the 1872 mining law, and thus allowing uranium corporations to conduct unfettered exploratory drilling and mining on the thousands of mining claims within the proposed withdrawal area. In addition, please:

- Analyze and disclose potential impacts of this mining on Grand Canyon National Park's natural resources, visitors' experiences, recreation and the regional tourism economy;
- Analyze and disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on groundwater and the connections to surface water and their dependent species in around the Grand Canyon;
- Discuss scientific uncertainties attending hydrogeology, the connections between ground and surface water systems, and how these uncertainties can contribute to potential mining contamination of those systems;
- Analyze and disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on sensitive, threatened, and endangered species; soils; air quality; surface water; native and endemic plant and animal species; human health; and cultural resources;
- Analyze the impacts of cumulative actions -- all exploratory drilling and mining proposals on BLM lands north of the canyon, on forest service lands south of the canyon, on state trust lands and private lands;
- Analyze and disclose the widespread opposition and public controversy surrounding this uranium exploration proposal from the public, tribes, county, state, downstream communities, the National Park Service, and Congress;
- Analyze and disclose the impacts of uranium exploration and resulting mining on regional tourism, including an analysis of the impacts to visitor experience within Grand Canyon National Park and the potential conflicts between tourism and mining-associated development and traffic;
- Analyze and disclose the controversy attending the potential impacts of uranium exploration and resulting mining on cultural values, including traditional beliefs of regional Native Americans.

Please consider this an official comment on the "Notice of Proposed Withdrawal" that appeared in the Federal Register on July 21, 2009 (Volume 74, Number 138).

#### Form Letter

#### Form Letter Text

#### Form Letter 31

I am writing in support of the Department of Interior's proposal to withdraw from mineral entry nearly 1 million acres of public land in the watersheds surrounding Grand Canyon National Park. The withdrawal is needed to protect the park and its watersheds from new uranium mining claims and the impacts that would attend developing the more than 10,000 claims that have already been staked.

Interior's environmental impact statement must rigorously evaluate the environmental consequences that would attend not enacting the withdrawal, leaving those lands open to the 1872 mining law, and thus allowing uranium corporations to conduct unfettered exploratory drilling and mining on the thousands of mining claims within the proposed withdrawal area. In addition, please:

- Analyze and disclose potential impacts of this mining on Grand Canyon National Park's natural resources, visitors' experiences, recreation and the regional tourism economy;
- Analyze and disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on groundwater and the connections to surface water and their dependent species in around the Grand Canyon;
- Discuss scientific uncertainties attending hydrogeology, the connections between ground and surface water systems, and how these uncertainties can contribute to potential mining contamination of those systems;
- Analyze and disclose the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on sensitive, threatened, and endangered species; soils; air quality; surface water; native and endemic plant and animal species; human health; and cultural resources;
- Analyze the impacts of cumulative actions -- all exploratory drilling and mining proposals on BLM lands north of the canyon, on forest service lands south of the canyon, on state trust lands and private lands;
- Analyze and disclose the widespread opposition and public controversy surrounding this uranium exploration proposal from the public, tribes, county, state, downstream communities, the National Park Service, and Congress;
- Analyze and disclose the impacts of uranium exploration and resulting mining on regional tourism, including an analysis of the impacts to visitor experience within Grand Canyon National Park and the potential conflicts between tourism and mining-associated development and traffic;
- Analyze and disclose the controversy attending the potential impacts of uranium exploration and resulting mining on cultural values, including traditional beliefs of regional Native Americans.

Please consider this an official comment on the "Notice of Proposed Withdrawal" that appeared in the Federal Register on July 21, 2009 (Volume 74, Number 138).

### Form Letter 4

I strongly support the proposal to withdraw the public land from mining activities. The Grand Canyon watershed is ecologically significant and provides important water resources to the western states. The threats posed by uranium mining are unjustifiable in such an important area.

Congress is considering pieces of legislation this year that could reform the 1872 Mining Law, change uranium mining on public lands to a leasing mechanism, and permanently withdraw the lands surrounding Grand Canyon National Park from mining. Until Congress decides how to best permanently protect the Grand Canyon watershed from uranium mining, BLM should withdraw these lands from new mining claims. Mining companies have been allowed to run roughshod over our public lands, without proper environmental protections and without giving the American people a fair return for use of our lands. I urge BLM to protect our significant landscapes, such as the Greater Grand Canyon, from the adverse effects of mining by withdrawing the surrounding lands from mineral exploration and mining.

# Form Letter Form Letter Text Form Letter 5 Thank you for taking emergency action to withdraw nearly 1 million acres around Grand Canyon National Park from new mining claims and for your support to reform the 1872 Mining Law. The Grand Canyon is a timeless national treasure. It offers hundreds of recreational opportunities for visitors, provides drinking water for more than 25 million Americans, and is home to 25 threatened and endangered animal species. Hardrock mining of gold and uranium in the areas surrounding the Canyon can leak toxic chemicals into the Colorado River and the environment, poisoning the water supply and wreaking havoc on the landscape. Please continue your efforts to protect our drinking water, the environment, and this treasured national park by withdrawing the land around the Grand Canyon from new mining claims for twenty years. Also, please continue working with Congress to permanently protect this and other iconic American landscapes by reforming the 1872 Mining Law. Please consider this an official comment on the "Notice of Proposed Withdrawal" that appeared in the Federal Register on July 21, 2009 (Volume 74, Number 138). I am writing to express my strong support of the withdrawal of approximately one million acres of public lands Form Letter 6 near Grand Canyon from mining activities, including both Bureau of Land Management lands on the Arizona Strip and national forests including the Kaibab. I am especially concerned about the impacts of uranium mining and the potential contamination of water in the Grand Canyon region, including seeps, springs, and the Colorado River which supplies water to tens of millions of people throughout the southwest. Any no-action alternative or failure to protect these lands from mining will put these resources at risk. Please analyze the impacts to all waters in the region when you evaluate this proposed withdrawal in an Environmental Impact Statement. How will failure to protect these lands from mining risk water supplies, wildlife, and Grand Canyon National Park? How will it affect the Park resources, visitors, and the economy of the region? Form Letter 7 The temporary ban of new uranium mining around the Grand Canyon area provides an important opportunity to protect this land. The public lands around the Grand Canyon are a national treasure. The Kaibab National Forest borders the southeast portion of Grand Canyon National Park--an area famous for its mule deer, elk, pronghorn and turkey hunting opportunities. We can halt new mining development and conserve this area for decades to come. Please choose to protect the wildlife and public lands of the Grand Canyon by banning all further uranium mining projects in this area. Form Letter 82 I am writing to support the withdrawal of approximately one million acres of public lands near Grand Canyon from mining activities, including both Bureau of Land Management lands and national forests. I am especially concerned about the impacts of uranium mining and the potential contamination of water in the Grand Canyon region, including Grand Canyon seeps, springs, and the Colorado River which supplies water to tens of millions of people throughout the southwest. Please analyze the impacts to all waters in the region when you evaluate this proposed withdrawal in an Environmental Impact Statement. You must also look at the potential impacts of any mining on Grand Canyon National Park, a crown jewel of our National Park System. How will this affect the Park resources, visitors, and the economy of the region? Please disclose and fully analyze the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on groundwater and the connections to surface water in around Grand Canyon. Evaluate all of the new hydrological information available from various hydrologists and

hydrogeologists who have expressed concerns about uranium mining and its potential impact on the water resources.

The Environmental Impact Statement must fully disclose and analyze the potential short-term, long-term, and cumulative environmental impacts of uranium exploration and mining on sensitive, threatened and endangered species; wildlife habitat; soils; air quality; surface water; native plant species; human health; and cultural resources.

I ask that you fully analyze the impacts of cumulative actions all exploratory drilling and mining proposals on BLM lands north of the canyon, on national forest lands south of the canyon, on state trust lands and private lands as well as connected actions such as all potential future development of these drilling sites.

---- [optional closing]-----

Thank you for considering my comments as you move forward with developing the Environmental Impact Statement. I strongly support protecting these lands from mining activities. I encourage you to do the same.

Form Letter	Form Letter Text
Form Letter 9	I am writing to urge the Bureau of Land Management (BLM) to abandon its proposed plan to block mining on nearly one million acres of land located near the Grand Canyon National Park in Arizona.
	BLM's proposal jeopardizes America's future energy and economic security, hardly a move that seems appropriate given the current economic challenges our nation is struggling to deal with.
	America has the largest nuclear power plant fleet in the world; a fleet that will play a critical role in providing the affordable, reliable and clean energy needed to achieve future energy and environmental goals. In a recent speech in New Orleans, President Obama emphasized his commitment to expanding the role nuclear power plays in meeting the nation's clean energy needs.
	Yet the president's commitment to nuclear power will be seriously jeopardized by BLM's unjustified proposed mining ban.
Form Letter 10	I am writing about HR 644 (Grand Canyon Watersheds Protection Act) which proposes to close 1.1 million acres of public lands to uranium exploration and mining in Northern Arizona. If enacted, this bill would have catastrophic consequences for Northern Arizona. I would certainly hope that you will oppose this bill for a number of reasons:
	1 Mining is an important industry in Arizona and other western states
	2 Exploration and mining provide higher wages and income than most other industries in the region
	3 The uranium orebodies in Northern Arizona have the highest grade ore in the U.S -about 5 times higher than anywhere else
	4 According to the U.S. Geological Survey, the Arizona Strip has a resource endowment of 375 million lbs, which is more than 40% of our country's uranium resources
	5 This is a rich resource for homegrown energy resources -reducing our dependence on foreign supplies
	6 The need for uranium In America is growing along with the number of new nuclear power plants
	7 Uranium mining does not harm the environment or contaminate water resources, as evidenced by an excellent track record of safe and environmentally responsible mining during the past 30 years in Northern Arizona. It did not and will not leave a legacy of pollution and contamination as opponents claim.
	8 This bill is clearly the handiwork of special interest groups intent on removing even more public lands from public use.
	For a State that is deeply in debt, the negative impacts on Northern Arizona could be many if this bill passes. During this time of economic crises, we can ill-afford to lose these high paying jobs along with the resulting taxes and State revenues that the uranium mining industry could provide. Please oppose this attempt of special interest groups to lock up this vast expanse of public lands in Arizona.
Form Letter 11	I am writing to register my opposition to Representative Grijalva's bill, HR 644 (the Grand Canyon Watersheds Protection Act), which would withdraw public lands in northern Arizona on the "Arizona Strip" from uranium exploration and mining. The land that he has identified is rich with uranium which is badly needed in our country today and in the future.
	A USGS study concludes that "the Grand Canyon region [NOT the Grand Canyon Park] has the potential of becoming the second most important uranium-producing region in the United States.
	To allow uranium mining companies to continue their work would provide desperately needed jobs and would bring serious income into our community and into our state. (Mining companies pay substantial fees to the government just for the opportunity to file mining claims before they can begin to explore and mine in an area.) Allowing this to happen will provide a huge economic benefit to this part of my state. First of all, this is a region where the economic crisis is far worse than you are hearing on the news. Secondly, our young people are leaving the area because there are no jobs. And, finally, our state of Arizona is facing an enormous financial deficit.
	Please oppose HR 644, and help create badly needed jobs in Northern Arizona.

Form Letter	Form Letter Text
Form Letter 12	As a visitor to the Gran Canyon region, I want to voice my strong opposition to mining near Grand Canyon.
	Grand Canyon is one of the world's greatest natural wonders. It deserves strong protections now and for generations to come. Radioactive pollution from uranium mining is a threat to Grand Canyon National Park visitors and wildlife, nearby Native American communities, and southwestern cities that get their water from the Colorado River.
	Please respect and enforce the resolution from Congress to withdraw these lands from mineral entry to protect Grand Canyon, its wildlife, and all those who depend on its waters.
Form Letter 13	I care deeply about the Grand Canyon and the surrounding public and tribal lands, so I am asking that you take immediate action to protect it and its watershed.
	The Grand Canyon is one of the world's greatest natural wonders and a crown jewel of our National Park System. Radioactive pollution from uranium mining is a threat to Grand Canyon National Park visitors and wildlife, nearby Native American communities and Southwestern cities that get their water from the Colorado River. Past uranium mining activities have left a legacy of waste, contamination, health problems, and are costing the taxpayers hugely for clean ups.
	Please immediately act to withdraw the Grand Canyon watershed from uranium mining.
Form Letter 14	I was deeply concerned to learn about Rep. Grijalva's bill HR 644 (the Grand Canyon Watersheds Protection Act) that proposes to close 1.1 million acres of public lands to uranium exploration and mining in the Arizona Strip, and other areas adjacent to (not in) the Grand Canyon.
	This bill would deprive Arizona of the economic benefits of continued uranium mining, including good paying jobs for many people in the local communities. The area is known to contain some of the richest uranium deposits in the U.S. In the 1980's, one uranium mining company had an approximate total direct impact of \$412 million on Fredonia and Kanab economies during this time. That would be approximately \$671 million in 2008 dollars. Also, developing this resource could greatly help in reducing carbon emissions by fueling nuclear power plants.
	With the economic crises we are facing today, we can't afford to turn our backs on an important component of the State's economic viability and this country's energy independence. Let's NOT allow this one-of-a-kind resource to be locked up by special interest groups who are simply ignoring the facts that since the 1970's, the uranium industry in Arizona has had an excellent track record of safe and environmentally responsible mining.

#### Form Letter

#### **Form Letter Text**

Form Letter 15

I was deeply concerned to learn about Rep. Grijalva's bill HR 644 (the Grand Canyon . Watersheds Protection Act) that proposes to close 1.1 million acres of public lands to uranium exploration and mining in the Arizona Strip, and other areas adjacent to (not in) the Grand Canyon.

This bill would deprive Arizona of the economic benefits of continued uranium mining, including good paying jobs for many people in the local communities. The area is known to contain some of the richest uranium deposits in the U.S., and developing this resource could greatly help in reducing carbon emissions by fueling nuclear power plants. In the 1980's, one uranium mining company had an approximate total direct impact of \$412 million on Fredonia and Kanab economies. That would be approximately \$671 million in 2008 dollars.

The back story to this bill, though, is that a number of special interest groups, namely the Grand Canyon Trust, the Center for Biological Diversity and the Sierra Club are the driving force behind the proposed bill. While they use specious arguments against mining (uranium in particular), I believe their mission goes beyond saving the Colorado River and the Grand Canyon from contamination, or saving endangered species or staving off global climate change...It's all about land control.

The proposed withdrawal areas include BLM lands in Houserock Valley, an area that does not have much uranium potential compared to the other proposed withdrawal areas. Further examination shows that the Grand Canyon Trust owns two substantial pieces of land within the Valley--Kane and Two-Mile Ranches. The ranches consist of approximately 1,000 acres of private land and associated water rights, and 850,000 acres of grazing leases on public lands managed by the Forest Service, Bureau of Land Management, and Arizona State Land Department. This land stretches from the Grand Canyon's north rim to the Utah border and connects three national monuments, two national recreation areas and eight wilderness areas. The proposed withdrawal would increase their "buffer zone" around these ranches --essentially locking up the public lands for the private use of a few well-funded special interests groups. Isn't it coincidental that Rep. Grijalva has recently joined the Board of Directors for Center for Biological Diversity?

Uranium mining is an important component of the State's economic viability and this country's energy independence. Let's NOT allow this one-of-a-kind resource to be locked up by special interest groups who are simply ignoring the facts that since the 1970's, the uranium industry in Arizona has had an excellent track record of safe and environmentally responsible mining.

<sup>&</sup>lt;sup>1</sup> The content of Form Letter 3 is identical to Form Letter 2, except that it omits the second paragraph of Form Letter 2. Because substantive comments were identified in the second paragraph of Form Letter 2, submittals omitting that paragraph were not recognized as having submitted those comments. The comments otherwise identified between the two form letters were coded identically and screened for duplicates in the final analysis.

<sup>&</sup>lt;sup>2</sup> Because no substantive comments were identified in the optional closing paragraph, submittals including or omitted it were all coded as Form Letter 8.